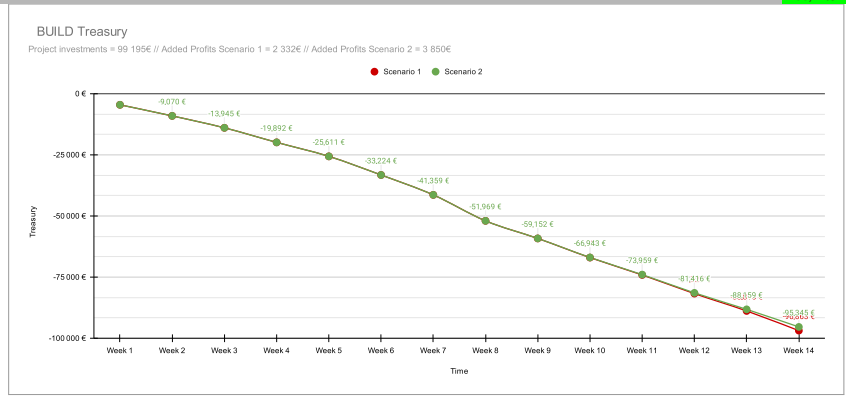
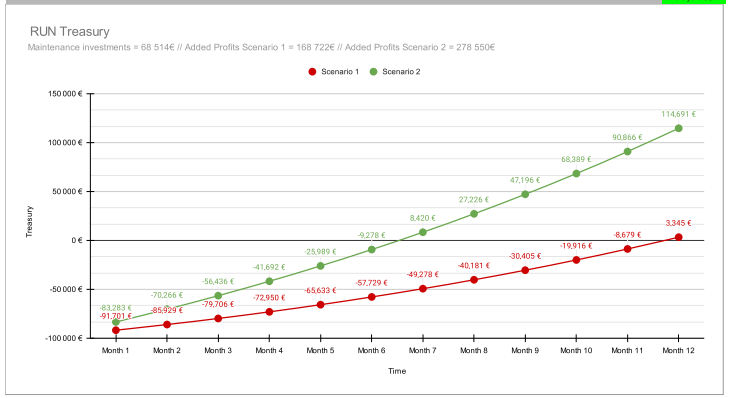
		BUILD														TOTAL	RUN												TOTAL
Time		Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12	Week 13	Week 14		Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12		
Sprints		Sprint 0		Sprint 1		Sprint 2		Sprint 3		Sprint 4		Sprint 5		Sprint 6			Quarter 1			Quarter 2			Quarter 3				Quarter 4			
Milestones		Kick-Off / PoC				MVP						V1					Semester 1						Semester 2							
Planning	Workload (days)																												
Product Manager		1	1	0,5	0,5	0,5	0,5	0,5	2	0,5	0,5	0,5	0,5	0,5	2	11	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	6
Product Owner		2	2	1	2	1	2	2	4	1	2	1	2	2	4	28	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	0,5	6
SCRUM Master		2	2	2,5	2,5	2,5	2,5	2,5	2,5	2,5	2,5	2,5	2,5	2,5	2,5	34	1	1	1	1	1	1	1	1	1	1	1	1	12
Frontend developer		0,5	0,5	5	5	5	5	5	5	5	5	5	5	5	5	61	1	1	1	1	1	1	1	1	1	1	1	1	12
Backend developer		0,5	0,5	5	5	5	5	5	5	5	5	5	5	5	5	61	1	1	1	1	1	1	1	1	1	1	1	1	12
AI / ML / Data Engineer		5	5	0	1	2	4	5	5	5	5	5	5	5	5	57	4	4	4	4	4	4	4	4	4	4	4	4	48
QA Engineer		0,5	0,5	1	2	1	2	1	2	1	2	1	2	1	2	19	1	1	1	1	1	1	1	1	1	1	1	1	12
SRE		0,5	0,5				1	2	4	0,5	0,5	0,5	0,5	0,5	0,5	11	2	2	2	2	2	2	2	2	2	2	2	2	24
TOTAL		**12**	**12**	**15**	**18**	**17**	**22**	**23**	**29,5**	**20,5**	**22,5**	**20,5**	**22,5**	**21,5**	**26**	**282**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**11**	**132**
Investments																													
Human	Cost / day (€)																												
Product Manager	450,00 €	450 €	450 €	225 €	225 €	225 €	225 €	225 €	900 €	225 €	225 €	225 €	225 €	225 €	900 €	4 950 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	225 €	2 700 €
Product Owner	350,00 €	700 €	700 €	350 €	700 €	350 €	700 €	700 €	1 400 €	350 €	700 €	350 €	700 €	700 €	1 400 €	9 800 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	175 €	2 100 €
SCRUM Master	300,00 €	600 €	600 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	750 €	10 200 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	3 600 €
Frontend developer	300,00 €	150 €	150 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	1 500 €	18 300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	3 600 €
Backend developer	350,00 €	175 €	175 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	1 750 €	21 350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	350 €	4 200 €
AI / ML / Data Engineer	400,00 €	2 000 €	2 000 €	0 €	400 €	800 €	1 600 €	2 000 €	2 000 €	2 000 €	2 000 €	2 000 €	2 000 €	2 000 €	2 000 €	22 800 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	1 600 €	19 200 €
QA Engineer	300,00 €	150 €	150 €	300 €	600 €	300 €	600 €	300 €	600 €	300 €	600 €	300 €	600 €	300 €	600 €	5 700 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	300 €	3 600 €
SRE	400,00 €	200 €	200 €	0 €	0 €	0 €	400 €	800 €	1 600 €	200 €	200 €	200 €	200 €	200 €	200 €	4 400 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	800 €	9 600 €
TOTAL		4 425 €	4 425 €	4 875 €	5 925 €	5 675 €	7 525 €	8 025 €	10 500 €	7 075 €	7 725 €	7 075 €	7 725 €	7 425 €	9 100 €	97 500 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	4 050 €	48 600 €
Infrastructure																													
Usage																													
# of articles		1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000		1000	1020	1040	1061	1082	1104	1126	1149	1172	1195	1219	1243	
# of photos per articles		10	10	10	10	10	10	10	10	10	10	10	10	10	10		10	10	10	10	10	10	10	10	10	10	10	10	
# of Personal Style feature users		0	0	0	0	0	0	0	0	100	200	500	1000	2000	5000		10000	10500	11025	11576	12155	12763	13401	14071	14775	15513	16289	17103	
# of Personal Styles per user										1	1	1	1	1	1		1	1	2	2	2	2	3	3	3	3	3	3	
# of photo per Personal Style										1	2	3	4	5	6		10	10	10	10	10	10	10	10	10	10	10	10	
# of model training		5	5	0	1	2	4	5	5	7	7	7	7	7	7		30	30	30	30	30	30	30	30	30	30	30	30	
Already in place																													
~~*App Service Plan*~~	~~*Serve web app*~~																												
~~*SQL Database*~~	~~*Web app data*~~																												
~~*Blob Storage*~~	~~*Articles photos*~~																												
Articles detection																													
Blob Storage (Standard - Hot)	Personal Style photos	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	1 €	2 €	2 €	20 €	21 €	44 €	46 €	49 €	51 €	80 €	84 €	89 €	93 €	98 €	103 €	778 €
Function	Schedule training	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €
Machine Learning (GPU)	Train : detect articles	100 €	100 €	0 €	20 €	40 €	80 €	100 €	100 €	140 €	140 €	140 €	140 €	140 €	140 €	1 380 €	600 €	612 €	624 €	637 €	649 €	662 €	676 €	689 €	703 €	717 €	731 €	746 €	8 047 €
Machine Learning	Predict : detect articles									0 €	0 €	1 €	3 €	7 €	25 €	36 €	69 €	7 €	15 €	15 €	16 €	17 €	27 €	28 €	29 €	31 €	32 €	34 €	320 €
NoSQL Database	Detected articles									0 €	0 €	0 €	0 €	0 €	1 €	1 €	10 €	11 €	22 €	23 €	24 €	26 €	40 €	42 €	44 €	47 €	49 €	51 €	389 €
Recommender																													
Function	Schedule training	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €
Machine Learning	Train : recommender	10 €	10 €	0 €	2 €	4 €	8 €	10 €	10 €	11 €	13 €	17 €	24 €	38 €	80 €	237 €	610 €	640 €	672 €	705 €	739 €	776 €	814 €	854 €	896 €	941 €	987 €	1 036 €	9 670 €
Machine Learning	Predict : rank articles									0 €	0 €	1 €	3 €	7 €	25 €	36 €	69 €	7 €	15 €	15 €	16 €	17 €	27 €	28 €	29 €	31 €	32 €	34 €	320 €
NoSQL Database	Ranked articles									0 €	0 €	0 €	0 €	0 €	1 €	1 €	10 €	11 €	22 €	23 €	24 €	26 €	40 €	42 €	44 €	47 €	49 €	51 €	389 €
TOTAL		110 €	110 €	0 €	22 €	44 €	88 €	110 €	110 €	152 €	153 €	160 €	170 €	193 €	273 €	1 695 €	1 389 €	1 308 €	1 413 €	1 465 €	1 518 €	1 574 €	1 704 €	1 768 €	1 835 €	1 906 €	1 979 €	2 055 €	19 914 €
TOTAL Investments		4 535 €	4 535 €	4 875 €	5 947 €	5 719 €	7 613 €	8 135 €	10 610 €	7 227 €	7 878 €	7 235 €	7 895 €	7 618 €	9 373 €	99 195 €	5 439 €	5 358 €	5 463 €	5 515 €	5 568 €	5 624 €	5 754 €	5 818 €	5 885 €	5 956 €	6 029 €	6 105 €	68 514 €
Returns																													
Comercial data																													
Base Value per sale	*20 €*																												
Base Margin per sale	*20%*																												
Base profits										*100 €*	*200 €*	*500 €*	*1 000 €*	*2 000 €*	*5 000 €*	*8 800 €*	*40 000 €*	*42 000 €*	*44 100 €*	*46 305 €*	*48 620 €*	*51 051 €*	*53 604 €*	*56 284 €*	*59 098 €*	*62 053 €*	*65 156 €*	*68 414 €*	*636 685 €*
Scenario 1																													
Feature impact : Value increase	15%																												
Feature impact : Margin increase	10%																												
Added Profits with Personal Styles										27 €	53 €	133 €	265 €	530 €	1 325 €	2 332 €	10 600 €	11 130 €	11 687 €	12 271 €	12 884 €	13 529 €	14 205 €	14 915 €	15 661 €	16 444 €	17 266 €	18 130 €	168 722 €
Treasury		-4 535 €	-9 070 €	-13 945 €	-19 892 €	-25 611 €	-33 224 €	-41 359 €	-51 969 €	-59 169 €	-66 995 €	-74 097 €	-81 727 €	-88 815 €	-96 863 €	-96 863 €	-91 701 €	-85 929 €	-79 706 €	-72 950 €	-65 633 €	-57 729 €	-49 278 €	-40 181 €	-30 405 €	-19 916 €	-8 679 €	3 345 €	3 345 €
ROI 1																-97,65%													1,99%
Scenario 2																													
Feature impact : Value increase	25%																												
Feature impact : Margin increase	15%																												
Added Profits with Personal Styles										44 €	88 €	219 €	438 €	875 €	2 188 €	3 850 €	17 500 €	18 375 €	19 294 €	20 258 €	21 271 €	22 335 €	23 452 €	24 624 €	25 855 €	27 148 €	28 506 €	29 931 €	278 550 €
Treasury		-4 535 €	-9 070 €	-13 945 €	-19 892 €	-25 611 €	-33 224 €	-41 359 €	-51 969 €	-59 152 €	-66 943 €	-73 959 €	-81 416 €	-88 159 €	-95 345 €	-95 345 €	-83 283 €	-70 266 €	-56 436 €	-41 692 €	-25 989 €	-9 278 €	8 420 €	27 226 €	47 196 €	68 389 €	90 866 €	114 691 €	114 691 €
ROI 2																-96,12%													68,39%

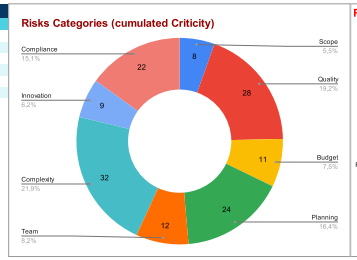


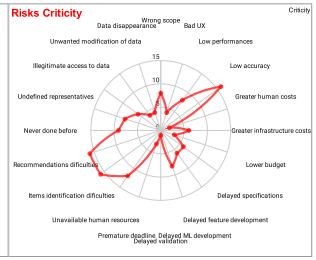


ID	Category	Risk	Title	Description	Owner	Impacts	Threats	Sources	Prevention measures	Mitigation measures	Likelihood	Severity	Criticity
1	Scope	**Feature does not satisfy user needs**	Wrong scope	Users don't use the feature because they don't need it	Product Owner	- less feature usage => lower returns - users insatisfaction => less new and returning users	- users do not need this feature - users are not used to this kind of feature	- users try to use the feature	- user research during first Sprint	- users feedback/satisfaction form	2	4	8
2	Quality	**Feature not implemented as expected by the user**	Bad UX	Users don't like the feature because it does not work as they expect	UX Designer	- confused users => less feature usage and more customer support	- users do not understand how the feature works	- users try to use the feature	- A/B testing	- feature usage monitoring	1	4	4
3	Quality	**Feature not usable because of low performances**	Low performances	Users complain about latency, lag or slow results	Tech Lead	- low percieved quality => less new and returning users	- users find the feature slow	- users try to use the feature	- performance testing	- profiling => code optimization and/or infrastructure resources increase	2	4	8
4	Quality	**Feature not usable because of low accuracy**	Low accuracy	Users complain about bad recommendations	AI Engineer	- low percieved quality => less new and returning users	- users find the feature useless	- users try to use the feature	- recommendation system evaluation metric	- re-train recommender system	4	4	16
5	Budget	**Under-estimated human costs**	Greater human costs	The actual salary of contributors is much higher than estimated	Product Manager	- increased costs	- job market salaries are higher than expected	- contributors are hired / allocated to the project	- salaries benchmarking before kick-off	- re-negotiate project budget - use less paid (less skilled / more junior) contributors	1	2	2
6	Budget	**Under-estimated infrastructure costs**	Greater infrastructure costs	The actual cost of infrastructure usage is much higher than estimated	Tech Lead	- increased costs	- infrastructure price per usage increase - infrastructure usage higher than expected	- developers and AI Engineer use infrastructure resources - they don't optimize resources usage (stop unused environments)	- train tech team to resources costs optimisation	- monitor resources usage and costs	3	2	6
7	Budget	**Over-estimated available budget**	Lower budget	The actual available budget for the project is much lower than estimated	Product Manager	- not enough budget for the full project	- available budget is lower than estimated	- project budget allocation	- ask for available budget in advance	- reduce project scope	1	3	3
8	Planning	**Under-estimated specification time**	Delayed specifications	The time required to produce specification is much higher than estimated	Product Owner	- slows the production chain => delays product delivery => stretches project planning => increases costs	- product owner needs more time than estimated	- product owner prepares user stories		- identify and fix causes of slowness (kaizen)	2	3	6
9	Planning	**Under-estimated feature development time**	Delayed feature development	The time required to develop the feature is much higher than estimated	Tech Lead	- slows the production chain => delays product delivery => stretches project planning => increases costs	- developers needs more time than estimated	- developers develop user stories		- identify and fix causes of slowness (kaizen)	3	2	6
10	Planning	**Under-estimated ML development time**	Delayed ML development	The time required to train and optimize the ML models is much higher than estimated	AI Engineer	- slows the production chain => delays product delivery => stretches project planning => increases costs	- AI Engineer needs more time than estimated - data acquisition / cleaning is more complex than expected - model training / optimization is more complex than expected	- AI Engineers develop user stories		- identify and fix causes of slowness (kaizen)	4	2	8
11	Planning	**Under-estimated validation time**	Delayed validation	The time required to test and validate the feature is much higher than estimated	QA Engineer	- slows the production chain => delays product delivery => stretches project planning => increases costs	- QA Engineer needs more time than estimated	- QA Engineers test user stories		- identify and fix causes of slowness (kaizen)	1	1	1
12	Planning	**Over-estimated available time**	Premature deadline	The actual deadline of the project is much sooner than estimated	Product Manager	- not enough time for the full project	- available budget is lower than estimated	- project planning	- ask for compagny deadlines in advance	- reduce project scope	1	3	3
13	Team	**Required skills are not available**	Unavailable human resources	Persons with the required skills are not all available	Product Manager	- planning stretches => higher cost - contributors don't have the required skills => lower quality	- contributors with required skills are not available according to the planning	- project planning and human resouces allocation	- book required resources in advance	- reduce project scope - re-negotiate project budget and/or planning	3	4	12
14	Complexity	**Identifying items in photos is harder than expected**	Items identification dificulties	Developing the items recognition engine requires more resources (time, data, budget) and/or skills than estimated	AI Engineer	- planning stretches => higher cost - more infrastructure usage => higher cost - bad items detection accuracy => lower quality	- ML model is hard to train / optimize - not enough training data - bad quality training data	- AI Engineers develops items detection system	- proof of concept during first Sprint		4	4	16
15	Complexity	**Making relevant recommendations is harder than expected**	Recommendations dificulties	Developing the items recommendation engine requires more resources (time, data, budget) and/or skills than estimated	AI Engineer	- planning stretches => higher cost - more infrastructure usage => higher cost - bad recommender system accuracy => lower quality	- ML model is hard to train / optimize - not enough training data - bad quality training data	- AI Engineers develop recommender system	- proof of concept during first Sprint		4	4	16
16	Innovation	**Integration of AI components is a first**	Never done before	Since this project is the first of its kind, there is no prior knowledge ("expect the unexpected")	Product Manager	- unknown risks => high uncertainty => planning/budget/scope drift	- unknown risk	- during all the project	- integrate some margin in estimations		3	3	9
17	Compliance (PIA)	**DPO and organisation manager are not defined**	Undefined representatives	DPO and organisation manager must be defined	Product Manager	- not-compliant product => legal risk (> 10M€)	- record of data processing is not conform	- in case of control (CNIL / GPDP)	- identify DPO and organisation representative		2	4	8
18	Compliance (PIA)	**Illegitimate access to data**	Illegitimate access to data	An unauthorized entity has access to users personal data (Profile informations and/or Personal Style photos)	SRE	Profiling of data subject	- Access to the Database - Access to the Blob Storage - Man-in-the-Middle - User credentials theft	Internal human, External human, Technical incident	- SSL Encrypted communications - Software security audits and pentests - Cloud : Role Based Access Control (RBAC) - Software : Role Based Access Control (RBAC) - Blur faces - Data access and modification Traceability		2	3	6
19	Compliance (PIA)	**Unwanted modification of data**	Unwanted modification of data	An unauthorized entity alters users personal data (Profile informations and/or Personal Style photos)	SRE	Unusable Recommendations feature	- Access to the Database - Access to the Blob Storage - Man-in-the-Middle - User credentials theft	Internal human, External human, Technical incident	- SSL Encrypted communications - Software security audits and pentests - Cloud : Role Based Access Control (RBAC) - Software : Role Based Access Control (RBAC) - Backup and restore - Data access and modification Traceability		2	2	4
20	Compliance (PIA)	**Data disappearance**	Data disappearance	An unauthorized entity removes users personal data (Profile informations and/or Personal Style photos)	SRE	Unusable Recommendations feature	- Access to the Database - Access to the Blob Storage - Unavailable services - User credentials theft	Internal human, External human, Technical incident	- SSL Encrypted communications - Software security audits and pentests - Cloud : Role Based Access Control (RBAC) - Software : Role Based Access Control (RBAC) - Backup and restore - Data access and modification Traceability		2	2	4

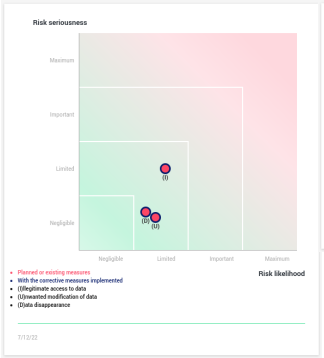
ACTION PLAN

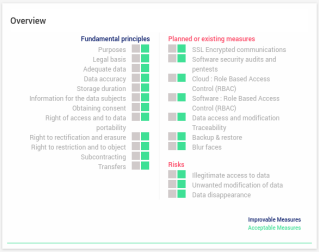
Status	Owner	Action
TODO	AI Engineer	- proof of concept during first Sprint
TODO	AI Engineer	- recommendation system evaluation metric
TODO	Product Manager	- book required resources in advance
DONE	Product Manager	- integrate some margin in estimations
TODO	Product Owner	- user research during first Sprint
TODO	Tech Lead	- performance testing
TODO	Product Manager	- identify DPO and organisation representative

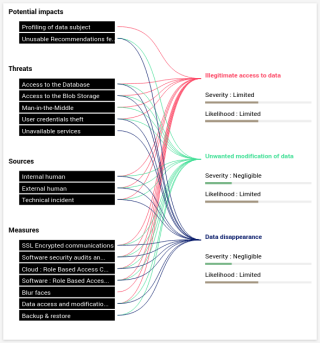




Privacy Impact Assessment (PIA)







Contact details	First Name	Last Name	Email Address	Phone Number	Postal Address
Responsible for the organisation	*To Be Defined (TBD)*	*TBD*	*TBD*	*TBD*	*TBD*
Representative	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
Data Protection Officer (DPO)	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*

Processing operation	N° / REF	Date of creation of the record form	Last update of the record form	Purpose of the data processing	Special categories of personal data?
Already in place					
~~***Authentication***~~	~~*1*~~				
~~***Items search***~~	~~*2*~~				
~~***Items in shopping cart***~~	~~*3*~~				
~~***Purchase***~~	~~*4*~~				
~~***Delivery***~~	~~*5*~~				
~~***Satisfaction***~~	~~*6*~~				
New					
Profile settings	7	11/07/2022	11/07/2022	- Store user profile informations - Filter relevant items (matching profile criteria) - Improve items recommendations (content-based filtering)	No
Personal Style photos	8	11/07/2022	11/07/2022	- Store users Personal Styles photos - Identify relevant items (similar to those in the photo) - Improve items recommendations (content-based filtering)	No
Recommender System	9	12/07/2022	12/07/2022	- Produce and store items recommendations based on user Profile informations and Personal Style photos	No

Description of the processing operation	
Name of the processing operation	Profile settings
N° / REF	7
Data of creation of the processing	11/07/2022
Update of the processing	11/07/2022

Stakeholders	Name	Address	ZIP Code	Town	Country	Phone number	Email address
Controller	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
Data protection officer	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
~~**DPO's Organisation (if external DPO)**~~	~~N/A~~						
~~**Representative**~~	~~N/A~~						
~~**Joint controller(s)**~~	~~N/A~~						

Purpose(s) of the data processing	
Main purpose	Improve items recommendation
Sub-purpose 1	Filter relevant items
Sub-purpose 2	Store user profile informations
Sub-purpose 3	Software debugging

Categories of personal data	Description	Data retention period
~~**Marital status, ID, identification data, images...**~~	~~N/A~~	
Personal life (lifestyle, family situation, etc.)	gender, age, shirt size, pants size, shoes size, favorite colors, favorite styles	- Actual data : While consented - Backups : 2 weeks
~~**Economic and financial information (income, financial situation, tax situation, etc.)**~~	~~N/A~~	
~~**Connection data (IP address, logs, etc.)**~~	~~N/A~~	
Location data (movements, GPS data, GSM, etc.)	location	- Actual data : While consented - Backups : 2 weeks
~~**Social Security Number (or NIR)**~~	~~N/A~~	

Special categories of personal data	Description	Data retention period
~~**Data revealing racial or ethnic origin**~~	~~N/A~~	
~~**Data revealing political opinions**~~	~~N/A~~	
~~**Data revealing religious or philosophical beliefs**~~	~~N/A~~	
~~**Data revealing trade union membership**~~	~~N/A~~	
~~**Genetic data**~~	~~N/A~~	
~~**Biometric data for the purpose of uniquely identifying a natural person**~~	~~N/A~~	
~~**Data concerning health**~~	~~N/A~~	
~~**Data concerning a natural person's sex life or sexual orientation**~~	~~N/A~~	
~~**Data relating to criminal convictions and offences**~~	~~N/A~~	

Categories of data subjects	Description	Details
Category 1	Authenticated users	Any user who has created an account and given their consent

Recipients	Type of recipient	Details
Recipient 1	Internal - Software Engineering team	(Write) To store the data in the database (Read) To debug the web application
Recipient 2	External - Cloud Service Provider	To host the database

Security measures	Type of security measure	Details
Security measure 1	Software : Role Based Access Control (RBAC)	Only the user can edit its profile data
Security measure 2	Cloud : Role Based Access Control (RBAC)	Only authorized internal personnel has access to the users profile data
Security measure 3	Software security audits and pentests	The system is audited and pentested at least once per year
Security measure 4	SSL Encrypted communications	Any communication (frontend -> backend -> database -> ML) goes through a TLS > 1.2 tunnel
Security measure 5	Backup & restore	Daily backups stored for 2 weeks.
Security measure 6	Data access and modification Traceability	Every access to and modification of data is logged : - timestamp - author_id - data_id : table_column - origin : API endpoint used - action : READ/WRITE/DELETE - new_value (if action = WRITE)

Transfers to third countries or international organisations	Recipient	Country	Type of guarantees	Links to relevant documents
Recipient organisation 1	Microsoft Azure - West Europe	Netherlands	Data residency in Azure	Data Protection Resources

Description of the processing operation	
Name of the processing operation	Personal Style photos
N° / REF	8
Data of creation of the processing	12/07/2022
Update of the processing	12/07/2022

Stakeholders	Name	Address	ZIP Code	Town	Country	Phone number	Email address
Controller	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
Data protection officer	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
~~**DPO's Organisation (if external DPO)**~~	~~N/A~~						
~~**Representative**~~	~~N/A~~						
~~**Joint controller(s)**~~	~~N/A~~						

Purpose(s) of the data processing	
Main purpose	Improve items recommendation
Sub-purpose 1	Identify relevant items
Sub-purpose 2	Store user style photos and preferences
Sub-purpose 3	Software debugging

Categories of personal data	Description	Data retention period
Marital status, ID, identification data, images...	photos of people (potentially the user himself) wearing clothing items that the user likes	- Actual data : While consented - Backups : 2 weeks
~~**Personal life (lifestyle, family situation, etc.)**~~	~~N/A~~	
~~**Economic and financial information (income, financial situation, tax situation, etc.)**~~	~~N/A~~	
~~**Connection data (IP address, logs, etc.)**~~	~~N/A~~	
~~**Location data (movements, GPS data, GSM, etc.)**~~	~~N/A~~	
~~**Social Security Number (or NIR)**~~	~~N/A~~	

Special categories of personal data	Description	Data retention period
~~**Data revealing racial or ethnic origin**~~	~~N/A~~	
~~**Data revealing political opinions**~~	~~N/A~~	
~~**Data revealing religious or philosophical beliefs**~~	~~N/A~~	
~~**Data revealing trade union membership**~~	~~N/A~~	
~~**Genetic data**~~	~~N/A~~	
~~**Biometric data for the purpose of uniquely identifying a natural person**~~	~~N/A~~	
~~**Data concerning health**~~	~~N/A~~	
~~**Data concerning a natural person's sex life or sexual orientation**~~	~~N/A~~	
~~**Data relating to criminal convictions and offences**~~	~~N/A~~	

Categories of data subjects	Description	Details
Category 1	Authenticated users	Any user who has created an account and given their consent
Category 2	Person present in the photo	Any person who is the main subject or present in the background of the photo

Recipients	Type of recipient	Details
Recipient 1	Internal - Software Engineering team	(Write) To store the photo in the blob storage (Read) To debug the web application
Recipient 2	External - Cloud Service Provider	To host the blob storage

Security measures	Type of security measure	Details
Security measure 1	Software : Role Based Access Control (RBAC)	Only the user can edit its Personal Style photos
Security measure 2	Cloud : Role Based Access Control (RBAC)	Only authorized internal personnel has access to the users Personal Style photos
Security measure 3	Software security audits and pentests	The system is audited and pentested at least once per year
Security measure 4	SSL Encrypted communications	Any communication (frontend -> backend -> database -> ML) goes through a TLS > 1.2 tunne
Security measure 5	Backup & restore	Daily backups stored for 2 weeks.
Security measure 6	Data access and modification Traceability	Every access to and modification of data is logged : - timestamp - author_id - data_id : table_column - origin : API endpoint used - action : READ/WRITE/DELETE - new_value (if action = WRITE)
Security measure 7	Blur faces	Any detected face in photos will be blurred

Transfers to third countries or international organisations	Recipient	Country	Type of guarantees	Links to relevant documents
Recipient organisation 1	Microsoft Azure - West Europe	Netherlands	Data residency in Azure	Data Protection Resources

Description of the processing operation	
Name of the processing operation	Recommender System
N° / REF	9
Data of creation of the processing	12/07/2022
Update of the processing	12/07/2022

Stakeholders	Name	Address	ZIP Code	Town	Country	Phone number	Email address
Controller	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
Data protection officer	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*	*TBD*
~~**DPO's Organisation (if external DPO)**~~	~~N/A~~						
~~**Representative**~~	~~N/A~~						
~~**Joint controller(s)**~~	~~N/A~~						

Purpose(s) of the data processing	
Main purpose	Recommend relevant items to users given their Profile informations and Personal Style photos
Sub-purpose 1	Store recommendations in database
Sub-purpose 2	Software or recommender system debugging

Categories of personal data	Description	Data retention period
Marital status, ID, identification data, images...	User items recommendations	- While consented
~~**Personal life (lifestyle, family situation, etc.)**~~	~~N/A~~	
~~**Economic and financial information (income, financial situation, tax situation, etc.)**~~	~~N/A~~	
~~**Connection data (IP address, logs, etc.)**~~	~~N/A~~	
~~**Location data (movements, GPS data, GSM, etc.)**~~	~~N/A~~	
~~**Social Security Number (or NIR)**~~	~~N/A~~	

Special categories of personal data	Description	Data retention period
~~**Data revealing racial or ethnic origin**~~	~~N/A~~	
~~**Data revealing political opinions**~~	~~N/A~~	
~~**Data revealing religious or philosophical beliefs**~~	~~N/A~~	
~~**Data revealing trade union membership**~~	~~N/A~~	
~~**Genetic data**~~	~~N/A~~	
~~**Biometric data for the purpose of uniquely identifying a natural person**~~	~~N/A~~	
~~**Data concerning health**~~	~~N/A~~	
~~**Data concerning a natural person's sex life or sexual orientation**~~	~~N/A~~	
~~**Data relating to criminal convictions and offences**~~	~~N/A~~	

Categories of data subjects	Description	Details
Category 1	Authenticated users	Any user who has created an account and given their consent
Category 2	Person present in the photo	Any person who is the main subject or present in the background of the photo

Recipients	Type of recipient	Details
Recipient 1	Internal - AI Engineering team	(Read) To train the items detection system (Read) To train the recommender system (Read) To debug the items detection system (Read) To debug the recommender system
Recipient 2	External - Cloud Service Provider	To host the recommender system processing units and store the recommendations

Security measures	Type of security measure	Details
Security measure 1	Software : Role Based Access Control (RBAC)	Recommendations are not editable through the software
Security measure 2	Cloud : Role Based Access Control (RBAC)	Only authorized internal personnel has access to the recommendations
Security measure 3	Software security audits and pentests	The system is audited and pentested at least once per year
Security measure 4	SSL Encrypted communications	Any communication (frontend -> backend -> database -> ML) goes through a TLS > 1.2 tunne

Transfers to third countries or international organisations	Recipient	Country	Type of guarantees	Links to relevant documents
Recipient organisation 1	Microsoft Azure - West Europe	Netherlands	Data residency in Azure	Data Protection Resources

What are the data processed?

- user Profile informations : gender, age, location, shirt size, pants size, shoes size, favorite colors, favorite styles
  - storage duration : while consented (2 weeks backup)
  - recipients :
    - Internal - Software Engineering team
      - (Write) To store the data in the database
      - (Read) To debug the web application
    - External - Cloud Service Provider
      - To host the database
- Personal Style photos : images of people (potentially the user himself) wearing clothing items that the user likes
  - storage duration : while consented (2 weeks backup)
  - recipients :
    - Internal - Software Engineering team
      - (Write) To store the photo in the blob storage
      - (Read) To debug the web application
    - External - Cloud Service Provider
      - To host the blob storage
- User items recommendations
  - storage duration : while consented
  - recipients :
    - Internal - AI Engineering team
      - (Read) To train the items detection system
      - (Read) To train the recommender system
      - (Read) To debug the items detection system
      - (Read) To debug the recommender system
    - External - Cloud Service Provider
      - To host the recommender system processing units and store the recommendations

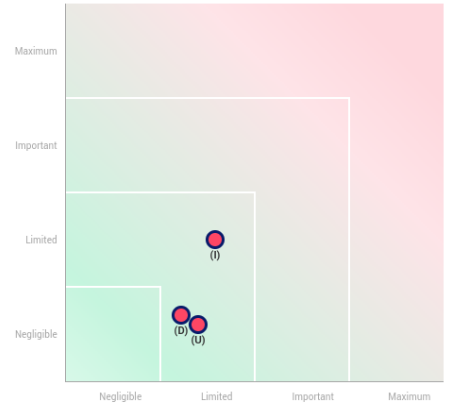
How does the life cycle of data and processes work?

- the user can complete his Profile informations
- the user can create Personal Styles and add photos
- whenever the user removes his consent to the processing of these data, all Profile and Personal Style data is deleted from the live database
- the Items Recognition system will process Persona Style photos to identify relevant items and preferences (favorite colors, favorite styles, gender, age, ...)
- the Recommender System will use the user Profile informations and recognized items and preferences from Personal Styles to produce relevant items recommendations

What are the data supporting assets?

- Web Application
- Mobile application
- Azure Web App (Linux/Ubuntu, Python/Flask)
- Azure Functions (Linux/Ubuntu, Python/Flask)
- Azure Databse (SQL)
- Azure DynamoDB (NoSQL)
- Azure Blob Storage
- Azure Machine Learning (Linux/Ubuntu, Python/scikit-learn)
- Azure Cognitive Services (Custom Vision)

Risk seriousness



- Planned or existing measures
- With the corrective measures implemented
- (I)llegitimate access to data
- (U)nwanted modification of data
- (D)ata disappearance

7/12/22

Overview

Fundamental principles

- Purposes
- Legal basis
- Adequate data
- Data accuracy
- Storage duration
- Information for the data subjects
- Obtaining consent
- Right of access and to data portability
- Right to rectification and erasure
- Right to restriction and to object
- Subcontracting
- Transfers

Planned or existing measures

- SSL Encrypted communications
- Software security audits and pentests
- Cloud : Role Based Access Control (RBAC)
- Software : Role Based Access Control (RBAC)
- Data access and modification Traceability
- Backup & restore
- Blur faces

Risks

- Illegitimate access to data
- Unwanted modification of data
- Data disappearance

Improvable Measures
Acceptable Measures

Potential impacts