

IMPACT ASSESSMENT – EXECUTIVE SUMMARY

This document is an excerpt/executive summary from an Impact Assessment conducted for Displayforce Global Limited (“**DISPL**”) with its registered office in Cyprus to verify the DISPL platform’s (“the **Platform**”) compliance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation (“**the GDPR**”). The Platform has been assessed by DZP in January 2023.

DISPL’s technology is designed to provide insightful data by means of **fully anonymous measurements** as the Platform employs advanced **facial detection** software working in real time, **not facial recognition** technologies.

The Platform does not collect or process any sensitive data that could be uniquely associated with an individual, **no image needs to be recorded or transmitted**.

All camera data processing by neural networks takes place locally on the devices themselves on processors without storing images/video streams in permanent memory and/or transmitting them elsewhere.

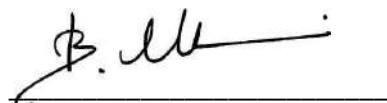
The Platform is fully ignorant of the consumers’ individual habits, it has no memory of the face it “saw” previously.

The Impact Assessment has showed that there are technical measures (verified solely in light of legal requirements) in place to support and minimize data processing inter alia the controller will apply a warning sign regarding video surveillance under the Guidelines 3/2019 on processing of personal data through video devices adopted on 29 January 2020. The GDPR periodical reviews are also recommended.

Given that according to the factual state presented in the Impact Assessment, DISPL **does not process special categories of data**. Therefore, **it is not obliged to obtain consent for such processing from data subjects**.

As long as the video surveillance warning sign is used and the rights of data subjects are observed, the Platform protects privacy and complies with the legal requirements imposed by the GDPR.

Yours sincerely,



Bartosz Marcinkowski, Partner