# VISOR Data Protection: Strategy and Evaluation

**Data Protection Strategy**

VISOR envisions the experimentation with federated machine-learning (ML) techniques over a mesh of IoT devices for the purpose of instrumenting smart crowd management (e.g., distributed dangerous object recognition, people trajectory tracking, as well as boundary-events recognition).

The experimentation in question is set to take place in the context of the PaasPop event (see here: <https://www.paaspop.nl/>) whose security and data-privacy is handled directly by Holland-Security Group (HSG) and with whom the VISOR team retains a complete collaboration and cooperation. In line with the privacy and security policy stated by HSG, the VISOR team will bring up and enact an ML federation which will run a total of 12 computational intelligence scenarios which may include data-processing over data for which GDPR restrictions apply. In the context of such potential restrictions, the VISOR teams envision:

1. To enact the privacy-policy consistent within the legal basis of a *“public task for the processing of anonymized data”* and under the terms and conditions already agreed upon by attendees to the event and the security services already in place (enacted by Holland-Security Group, see here: <http://www.hollandsecuritygroup.com/> );
2. In line with GDPR restrictions, to maintain data (in a format which is 100% anonymous at the source) for a period of up to 90 working days after the event is over; the anonymized-at-the-source form will be functional to further analysis and for research and post-processing purposes only. Furthermore, the data will be captured in low-resolution mode only, and without feature-engineering of any kind which may allow attendees’ own identity;
3. In line with GDPR restrictions, to identify all data pertaining to children (underage people) and immediately discard said data upon elicitation;
4. To gather, store, and process the data using private/owned cloud/infrastructure/hardware and under the aforementioned restrictions;

More specifically, with respect to article 1 and 2 from the above enumeration, the VISOR team commits to conduct experimentation within the allowance already agreed upon by event attendees who, according to the PaasPop privacy policy statement Sec. “Agreement by purchasing tickets”, bullet 3, line 2, namely “To provide services based on your location” as well as the privacy and security/event-protection policy enacted by HSG.

With respect to the above, the VISOR team aims at conducting fair scientific efforts towards a *“Public Task for the processing of anonymized data”* completely in line and under the obligations connected to our agreements with HSG and the help received under their privacy policy.

**Information concerning Festival Attendees**

Festival attendees are not expected to engage in any specific participatory action with respect to VISOR activities and are intended as *co-participatory*, meaning that the VISOR experimentation will capture their likelihood and appearance as well as circumstantial information concerning their participation in the event (trajectories, clothing) for the sole purpose of smart event management and maximization of event security and safety as well as crowd management in the context of said event.

**Consistency with respect to Algemene Verordening Gegevensbescherming**

**(AVG)**

In the scope of the VISOR experimentation, only JADS researchers are intended and explicitly allowed to participate, engage in, experiment with, and in any way interact with the VISOR equipment and experimental material in the context of the research project and no volunteers are asked to participate directly. No data is stored which could identify participants of PaasPop and only fully-anonymous data is stored after processing of the videos and telemetry gathered in the context of the field study – this policy document was revised and the conclusion is that the strategy herein is AVG-compliant. Furthermore, data storage and processing is done on the TU / e infrastructure and/or other private cloud. All data and data processing software is deleted after 90 days. Removal (deletion) is controlled by ICT / IT support by the TU / e.

**Evaluation by TU/e DPO**

**Summary**

Visor is independently responsible for the processing of personal data in the investigation and act like a **controller**.

**Purpose:**

The overall objective of VISOR is to increase order and safety in semi-public spaces through the smart application of data science.

Formally, the project is about smart event management, i.e., the protection of semi-public spaces with a federated machine-learning approach. More specifically in the context of the experimentation we aim at gathering data on the big data architecture/pipeline which is involved in the processing. Our focus is on experimenting with the architecture and the interacting components, we don’t care about identifying people or specific information about them

**Legitimate base**: public interest

**Data collection:** HSG (<http://www.hollandsecuritygroup.com>) will make snapshots of people browsing the festival available to Visor, with no way of identifying the festival visitors on-the-spot (i.e., they are anonymous to us at the source)

**Measurements:**

* The snapshots are not identifiable due to low resolution imaging is done on crowds.
* No identification of persons is possible or performed.
* Only the Visor team will view the images;
* Data storage and processing is done on the TU / e infrastructure (private cloud). All data and data processing software is deleted after 90 days. Removal (deletion) is controlled by ICT / IT support by the TU/e

**Data subject Rights**

Right to information, Art. 12 GDPR  
A data subject has the right to be informed by the Controller about various matters at the time of providing his or her personal data.

- Content: the controller must provide the following information:

* The identity and contact details of the responsible person; *Jads*
* The contact details of the Data Protection Officer; [*dataprotectionofficer@tue.nl*](mailto:dataprotectionofficer@tue.nl)
* The processing purposes for which the personal data are intended; *The overall objective of VISOR is to increase order and safety semi-public spaces through the smart application of data science.*
* The legal basis for the processing; *public interest*
* The recipients or categories of recipients of the personal data; *The Visor team*
* Retention periods; *90 days*
* The rights of those involved; *The personal data that is collected is anonymous, so there is no personal data that can be traced directly to a natural person, which means that no rights of data subjects can be executed.*
* Complaints procedure; [*dataprotectionofficer@tue.nl*](mailto:dataprotectionofficer@tue.nl)

**Visor must communicate this to those involved (attendees at the festival site) to prevent many questions and / or complaints from ending up with the Dutch Data Protection Authority.**

Visor must respect the following 7 principles of data collection under the GDPR, especially number 2 and 3:

A close up of a logo

Description generated with high confidence