

FootfallCam Data Anonymisation and GDPR Exemption - Fact Sheet

FootfallCam Data Anonymisation and GDPR Exemption - Fact Sheet

What Is GDPR and Who Is Affected?

The General Data Protection Regulation 2016/679 is a regulation designed to protect the data privacy of EU citizens and simplify the regulatory environment for business. It applies to companies who collect, store or use personal data.

Why Is FootfallCam Exempt from the GDPR?

FootfallCam does not collect, store or use any personal data. We designed our system by default to use only anonymised data. The GDPR Recital 26 states that *"...The principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable."*

How Do We Anonymise the Data?

Video - FootfallCam does not use video images (which are 2D) to count. Instead, we use the 3D depth map generated from its stereoscopic lens to count with high accuracy. The 3D depth map is comprised of grey pixels and contains information relating to the distance of the surfaces of scene objects from a viewpoint. There are only two instances where low-resolution videos are used – the live view page for checking the camera angle and videos recorded for verification. The videos used here are designed to be at a very low resolution of 320 x 240 pixels. This low resolution is exempt from the GDPR because it is not possible to recognise an individual from it.

Wi-Fi Tracking - FootfallCam detects the MAC address of a Wi-Fi enabled device but it immediately hashes the original MAC address with a one-way hashing algorithm (PBKDF2WithHmacSHA256), turning it into anonymised data straight away.

Risk of Anonymised Data Being Identified Is Remote - The one-way hashing algorithm that FootfallCam uses is irreversible. The only way to guess the original MAC address from its anonymised counterpart is to find a match by brute force. There are 281 trillion combinations of MAC addresses to try. Even if one knows the exact hashing algorithm and SALT key used, this will take 10-20 centuries to find a match. It is therefore reasonable to say that the possibility of identification is remote.

Hence, the Use of the FootfallCam System Does Not Affect Your Organisation's GDPR Compliance

The GDPR Recital 26 states that *"...This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes."*

The FootfallCam system is designed to only process anonymised data to provide people counting solutions to our clients and is thereby exempt from the GDPR. Hence, the use of the FootfallCam system does not affect the GDPR compliance of our clients' organisations.