

DISCLAIMER

The present Privacy Policy has the scope of supporting the use of the audience measurement product, according to Article 13 of the Regulation (EU) 2016/679 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 ("General Data Protection Regulation").

The information provided in this document contains only general descriptions and/or characteristics that may not match the specifics needs of each customer.

The present Privacy Policy is not, and is not intended to, constitute legal advice; instead, all information, content, and materials available on this document are for general informational purposes only.

The information contained herein does not necessarily reflect the opinions of our customers.

The customer, as the Data Controller, needs to define the suitability of the document and assumes all relevant responsibilities and obligations.

We hope that you will find the information below useful, and we would be delighted to speak with you to answer any questions you may have.

If you have any questions or would like to share any comments with us, please contact us via email at the following address: privacy@admobilize.com.

Anonymous advertising audience measurement device Privacy Policy in accordance with EU Regulation No. 679/2016 (General Data Protection Regulation).

Last updated: 30th April, 2024

Foreword

Anonymous advertising audience measurement software and device ("**Device**") is an innovative device/solution whose main purpose is to provide numerical information about the flows and number of individuals within its scope in outdoor and indoor environments. In order to achieve the numerical data, the Device processes specific Personal Data as defined in Article 4(1) of EU Regulation 679/2016 ("**General Data Protection Regulation**" or "**GDPR**").

This document describes how personal data are processed.

The information is provided in accordance with Article 13 of the GDPR to all those who interact with the Device first in a simplified form and then via Link access or QR code, in an extended form.

The data is processed by adopting the necessary technical and physical protection measures required by Law. This privacy policy refers to the relationship between the Data Subject and Pikasso Italia S.r.l. which is qualified as the data controller.

1. Data controller

The data controller is:

Pikasso Italia S.r.l.

Via Bonaventura Cavalieri, 8

20121 Milano

CF 12468120964

SDI BA 6 ET 11

PEC: pikassoitaliasrl@legalmail.it

The Data Protection Officer is: Dott. Elio Vincenti

2. Type of personal data processed

The audience measurement device envisaged consists of using sensor cameras installed next to or above advertising panels in order to measure, from the video stream analyzed in real time, attendance by counting the number of objects categorized as people, bodies, faces, age group, gender, vehicles, and dwell times. It is crucial to note that face detection is a part of the processing activities and involves the identification and categorization of faces within the video stream, constituting personal data.

Furthermore, the system specifically employs “face detection” technologies, not “face recognition” technologies. Face detection involves the identification of facial features, such as the presence of a face, but does not enable the identification of individuals through the use of biometric data. The system does not store or process biometric data for the purpose of individual identification. Additionally, the system does not permit live access, ensuring that real-time data analysis does not compromise individual privacy.

Users are hereby assured that the technology employed is designed to prioritize privacy by avoiding the use of biometric data for individual identification. Any data processed, including facial features as part of face detection, is solely for the purpose of aggregate audience measurement and analytics, and no attempt is made to personally identify individuals through the captured facial features.

This system makes it possible to establish audience statistics for an advertisement displayed in real time on the advertising panel, produced according to the following sequence:

- the camera-sensor captures a video stream processed locally in RAM and in real time, using algorithms translating into lines of anonymized data comprising the following data: the number of people, faces, bodies passing in front of the camera, their average attention time, gender, emotions, and the session time. As soon as the images have been processed by algorithms (less than 100 milliseconds), only the anonymized data is stored on the local machine (in random access memory), and no personal identifiable information data relating to individuals are stored;



- this anonymized data is aggregated at the local machine level and stored in this form before being sent to a secure server;
- therefore, only aggregated statistical data are kept after processing on secure servers.

Thus, video stream is neither recorded in memory of the local computer, nor transmitted to third parties, nor even visible by the data controllers or any third party, at any time of processing. AdMobilize technology uses the camera as the sensor for a video stream, not as a video recording device.

In order to carry out framing tests of the remote camera-sensor, it is planned to take preview images remotely: the image is automatically blurred at the device level (edge) before being sent to the data controllers via an encrypted connection. The level of blurring is enough to make faces not identifiable. A reminder message is displayed on the dashboard regarding the need to protect and not to save or store these images immediately after checking the camera angle.

Clear information is displayed to ensure transparency vis-à-vis the audience and passers-by (Warning Plate). The information notably specifies the purpose of the device and the identity of the data controllers, and refers to a website with regard to the additional information required by article 13 of the GDPR.

The anonymisation of data in the very short term therefore limits the exercise of certain rights of the data subject, as further specified in para. 9.

3. Legal Basis

The processing is carried out on the basis of a legitimate interest of the Data Controller, within the meaning of Article 6.1.f of GDPR for the purpose of obtaining statistical reports necessary, for example, for the improvement of its marketing strategies and its clients.

Such balancing is achieved by minimizing the collection of personal data by not creating any relevant risk with regard to their use and by adopting all the measures provided for by the legislation in force and also required by the Data protection Authority (as per provision no. 551 of 21 December 2017).

4. Purpose of processing

The purpose of the processing is to obtain statistical reports on the following data points: (i) identifier of the Device; (ii) date and time; (iii) viewer attention time; (iv) gender of the viewer; (v) age range of the viewer; (vi) facial expression estimation, quantified in 7 levels from happy to sad; (vii) number of people. This data is used by the Controller in order to improve its and their client's marketing strategies.

5. Modalities of processing

The Device processes personal data for a few milliseconds and then immediately undergo anonymisation processes.

Thus, the Controller handles the personal data of users in an anonymized manner, implementing suitable security measures to prevent unauthorized access, disclosure, alteration, or destruction of the data. Additionally, it ensures the physical security of audience measurement devices by employing appropriate



security measures in accordance with Article 32 of GDPR and any applicable laws. The processing of data is performed using both computerized and/or telematic tools, employing organizational methods and logic directly associated with the specified purposes to guarantee an adequate level of personal data protection.

6. Data retention periods

The audience measurement device therefore does not store any data on data subjects except to the extent described.

7. Transfer of data

Personal data is transferred outside the European Union, as the data processor “AdMobilize, LLC” is located in the United States of America. However, such transfers shall strictly adhere to the conditions laid down in Chapter V of the General Data Protection Regulation (GDPR). Additionally, it is ensured that anonymised data undergoes immediate deletion from the volatile memory of the audience measurement device upon transfer.

8. Place of processing

The processing of data takes place at the physical location where the Device are positioned, either at the Edge or local level, in the manner described above. Once anonymized, data storage could also be placed in different locations where the involved parties are lawfully situated.

The technology solution is provided by AdMobilize, LLC which serves as a data processor for personal data. More information about AdMobilize can be found on www.admobilize.com The data subject retains the right to inquire about the specific location(s) of the data processing at any given time.

9. Rights of the data subject

The purposes of the processing described in this notice do not require the identification of potential data subjects, therefore, the data controller, pursuant to Article 11.1 of GDPR, is not required to store, acquire or process additional information to identify the data subject for the sole purpose of complying with the Regulation.

Additionally, pursuant to the anonymization of data, the right of access (Article 15), right to rectification (Article 16), right to erasure (Article 17), right to restriction of processing (Article 18), and right to portability (Article 20) cannot be exercised, as it is impossible to identify individual data subjects.

You still retain the right to object to the processing of your personal data under Article 21 of the GDPR.

If you have any concerns or questions regarding the processing of your personal data, you have the right to ask for information about the processing of your personal data, in particular: about the purposes of the processing, the categories of personal data involved, and any recipients of your data.

We are committed to addressing your concerns and providing any necessary information to ensure transparency and compliance with data protection regulations.

Contact us here: pikassoitaliasrl@legalmail.it



10. Changes to the Privacy Policy

The data controller retains the authority to modify this privacy policy and will make such changes available. Therefore, it is advisable to regularly review this page or section of the website, referring to the date of the most recent modification mentioned at the bottom.

11. Complaints

In any case, the data subject has the right to lodge a complaint with the Data protection Authority ("Autorità Garante della protezione dei dati") by writing, according to the procedures provided for by law and available at the following link: www.garanteprivacy.it.