

White Paper: GDPR, Physical Security, and Viakoo

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1. Overview on GDPR and Physical Security

The General Data Protection Regulations (GDPR) come into effect on May 25, 2018, with the purpose of unifying data protection standards of all European Union (EU) countries and providing all EU citizens rights and protections regarding their personal information. While EU based, the impact of GDPR is global, in that all data collected or processed on EU citizens fall under these regulations regardless of where the collection or processing of that takes place.

For physical security systems, including video surveillance and access control, there are significant requirements that GDPR places on operators of such systems. In particular, because of facial recognition and automated license plate recognition, operators of physical security systems can only handle personally identifiable data with that person's consent and must stop using any and all such data at their request. In addition, unauthorized access to personal information (such as through a cyber-breach) must be reported to the people effected.

This document is meant to help you to understand both how Viakoo can assist operators of physical security systems in achieving GDPR compliance, as well as defining how Viakoo's systems and products themselves are compliant to GDPR.

2. How Viakoo Helps Meet Operational and Technical Requirements of GDPR

GDPR requires data controllers and processors to implement both organizational and technical safeguards to ensure the rights and freedoms of data subjects are not compromised.

Organizational safeguards include data protection by design for data, which Viakoo can directly assist in. Likewise, under GDPR footage from video surveillance systems can be retained for 30 days (or longer if a risk assessment is performed). Viakoo's patented technology for calculating and tracking retention periods for video evidence is directly applicable to this requirement.

Viakoo's system is designed to not use or contain personal information apart from login credentials to our products. **Specifically, Viakoo's technology does not view, analyze, or transmit video surveillance or access control data (or the ability to derive personal information from such data).** Our data gathering is limited to metadata about system operation, and therefore our technology is not meant for customers to use to analyze, modify, or interpret surveillance or access control data for compliance to GDPR regulations. For example, the need to redact or obscure faces captured in the operation of a video surveillance system is beyond the scope and capabilities of Viakoo's products.

However, Viakoo's products provide powerful cyber-security and verification capabilities that are needed by physical security system operators in achieving GDPR compliance. Viakoo's products help organizations create and maintain a policy of "data privacy by design", though our ability to perform continuous verification of the physical security network and generate alerts when failures, issues, or potential breaches occur.

Viakoo's products provide physical security system operators the ability to leverage push-button reporting, automated proof of operations, and tools to help prevent cyber-breaches (outlined below). These are requirements for operators of physical security systems under GPDR that Viakoo's automated products can be used for to replace manual methods.

Specific capabilities within Viakoo that assist in a policy of data protection by design are:

- a. Camera device firmware updating
 - i. Viakoo automatically detects the camera firmware version currently in use, and using a secure chain-of-trust method can automatically update camera firmware to improve cyber-security.
- b. Device Inventory
 - i. Viakoo automatically creates an inventory of physical security devices on the network, assisting in maintaining authorized devices.
- c. Malicious file deletions
 - i. Viakoo's patented technology tracks video files to ensure that they are retained through the required retention period, and can detect when malicious file deletions have taken place.
- d. Operational logs
 - i. Viakoo provides logs of system and device level operational status.
- e. Threshold settings
 - i. Viakoo's system can provide alerts and notifications when thresholds on operational measure are exceeded, providing warning of abnormal system behavior.

3. How Viakoo Stores and Manages Personal Information

Viakoo's products are (by design) not able to provide or analyze personal identification information.

Here are the key aspects of how Viakoo stores and manages personal information:

- a. Viakoo does not hold, store, or transmit any video image data, access control logs, or other outputs from physical security systems that would contain or reveal personal information.
- b. Viakoo's systems do contain metadata on system operations, location information of physical security devices, and calculated results of our analysis of this data.
- c. The metadata contained within Viakoo's systems are held and transmitted in encrypted formats.
- d. The source of all data that resides in Viakoo's systems are from data entered by registered users as part of activating Viakoo products for their use, and from metadata

observed and recorded by Viakoo's software agents. Viakoo does not use third party data sources.

- e. Registered users of Viakoo's products will have personal information held within our system to authenticate and enable access to the data listed above. This personal information can include name, email address, company name, job title, and information about their company locations.
- f. Registered users can view the personal information held within our system by logging in and clicking on the "My Profile" link in the menu.
- g. Data on registered users resides both in Viakoo's development center and our cloud-based environment (hosted by Amazon Web Services and covered by Amazon's GDPR policy).
- h. Viakoo regularly performs through due diligence and regular audits of Amazon Web Services, and will for any external cloud services we may use in the future.

4. Viakoo Notification Policy

Users of Viakoo's products will have their personal information used to inform them of key events, product changes, and other product related issues, as described below:

- a. Viakoo uses the customer information listed above to provide regular updates on product status, product releases, and other information Viakoo deems useful to our customers.
- b. If there is any incident related to Viakoo's systems that have the potential to allow customer data (contact information or metadata on system operation), Viakoo will inform all affected parties within 72 hours of such an incident.
- c. Any modifications or changes to cloud services used by Viakoo that pertain to personal customer information will be communicated to all affected parties before such a change is made.

5. Viakoo Privacy Policy

Viakoo maintains a Privacy Policy which covers in detail how your information is handled. We encourage you to read this policy at: <https://www.viakoo.com/privacy-policy/>

About Viakoo

Viakoo Inc. is an Industrial Internet of Things (IoT) company, located in Mountain View, California, USA.

Viakoo's cloud-based offering for service assurance is the first, and to date the only, video-infrastructure-cognizant solution purpose-built for electronic physical security and IoT systems.

Viakoo automatically verifies performance and integrity of physical security systems and devices while delivering automated proof of their system compliance. Leveraging machine learning and purpose-built algorithms, Viakoo quickly and automatically detects physical security system failures, diagnoses problems, alerts users with repair information, and maintains historical records on operations. With Viakoo, users improve physical surveillance and security reliability and performance, gain critical insight into physical security systems, capture valuable operational performance information, eliminate lapses in security coverage and automate reporting for compliance and auditing.

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