

## **BERCMAN PRIVACY NOTICE**

### **INTRODUCTION**

This is a description of how The Smart Pedestrian Crosswalk (“SPC”) solution is built to respect individuals’ privacy while providing improved traffic safety on unregulated pedestrian crosswalks. It describes how the data is collected, used and deleted in the SPC product.

### **SPC SYSTEM DESCRIPTION**

SPC solution is built as an anonymised data analytics system which means that the radars, sensors, cameras and data analytics algorithms does not identify the individuals or vehicles that are captured by the system on crosswalks. The images caught by the system are anonymised near instantly. For the product, it is important to capture and analyse the object and its moving trajectory, not the fact of who he/she is. To detect the situations involving traffic hazards, narrow artificial intelligence algorithms are used, which are capable of predicting the moving trajectories of the road users and warn them in advance.

SPC system also have a built-in speaker which allows to add a voice warning message that will be activated if there is a pedestrian on the pedestrian crossing and the speeds of oncoming vehicles are not reduced.

In case the client chooses to use the average vehicle speed measuring functionality in our SPC product, we process hashed license plate numbers of the vehicles. This means that we do not store or process directly identifiable vehicle registration numbers in our system.

Captured video file is stored in a local control unit near the crosswalk for a maximum of 72 hours. After this period the file is deleted by overwriting it. The purpose for this storage is to enable the police authority to have the access to the video file if needed in case of accidents. Such video storage is only done locally in our unity and not transferred to any third-party service provider (e.g., cloud services).

In case the SPC captures and stores, for short period of time, any data that may be personally identifiable, the controller of such personal data is usually our Client (e.g. local municipality) as they are in the position of deciding the purposes and means of personal data processing as well as the legal ground for such activity.

We, (Bercman Technologies AS, Reg. no. 14134425, Riia 26, Tartu, 50405, Estonia), are the data processors which means that we provide the technical solution SPC, but our client is data controller who decides to use our SPC solution and related data processing on their territory.

We in Bercman highly respect individuals’ privacy and data protection requirements. For this reason, we design our products and services always keeping in mind the minimum impact to

privacy. We always prefer anonymized data processing as the first option and in case the potentially identifiable data needs to be processed, we implement high level personal data protection and information security safeguards according to legal framework (GDPR) and industry's best practices.

## YOUR RIGHTS

If you have any further questions regarding our SPC system and possible privacy concerns, please contact us on [info@bercman.com](mailto:info@bercman.com).

Under data protection law, you have rights including:

1. *Right to be informed and to access.* You may get information regarding whether we process your personal data or not and access to your personal data if processed by us.
2. *Right to data portability.* You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party.
3. *Right to erasure.* You have the right to have personal data we process about you erased from our systems if the personal data are no longer necessary for the related purposes.
4. *Right to object and restrict.* You have the right to object to the processing of your personal data and restrict it in certain cases.
5. *Right to rectification.* You have the right to make corrections to your personal data.
6. *Right to withdraw consent.* When you have given us consent to process your personal data, you may withdraw said consent at any time.

To exercise any of the abovementioned rights, please contact [info@bercman.com](mailto:info@bercman.com) and we will respond to your requests within 30 days.

You may also lodge a complaint to the supervisory authority, the [Estonian Data Protection Inspectorate](https://www.aki.ee), [info@aki.ee](mailto:info@aki.ee).

*This Privacy Notice was updated in March 2022*

In case you visit our website, please read our [Website Privacy Policy](#)