



# GDPR

**GENERAL DATA PROTECTION REGULATION**  
in  
**FACE RECOGNITION**

How **Ultinous'** solution helps to comply

# About GDPR

GDPR stands for General Data Protection Regulation, a law in the EU on the protection of personal data. GDPR puts emphasis on the right of individuals to protect their personal data, no matter if such data are processed within or outside the EU. Personal data are all data that are or could be linked to a natural person. GDPR entered into force in April 2016 and has been applicable since 25th May 2018.

## GDPR focuses on



### CLARIFICATION

on the definition of personal data and data processing roles

### PROTECTION

of individuals' personal data



### CONTROL

is provided to data subjects to manage their processed data

### DEFINE

clear duties and responsibilities for data controllers and processors



## Roles and Responsibilities in personal data handling



### DATA SUBJECT

the person whose personal data are collected and managed

*E.g. A customer in a shop*



### DATA CONTROLLER

individual or organisation that defines the purpose and the means of personal data processing and is responsible for appropriate data protection measures

*E.g. The shop owner who operates the CCTV system*



### DATA PROCESSOR

individual or organisation that works (e.g. analyses) with personal data

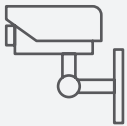
*E.g. Ultinous that runs the video analytics service on the shop owner's video stream*

If you are a potential **customer of Ultinous**, you will most likely act as the **controller of personal data**. In such a setting, you will forward personal data to Ultinous for processing. **Ultinous will act** on your behalf **as the data processor**.

**Ultinous customers as data controllers** determine the purpose and the means of personal data processing. They are responsible for implementing appropriate technical and organisational measures to ensure and demonstrate that data processing is carried out in compliance with the GDPR.

## How Ultinous supports GDPR compliance

Ultinous supports you by providing details of our technology that will most likely influence how you, as our potential customer can take measures to be fully compliant with GDPR.



1

We take pictures of individuals with the help of video cameras

153427598  
5345964134  
612049450  
242657894  
710614068  
7416

2

We convert the picture into a sequence of numbers called vector. It takes the fraction of a second from taking the picture to getting the vector.



3

We might or might not determine the age and gender of such individuals, depending on the use case in question.



4

Once we get the vector, we delete the picture without delay, and we do that irreversibly.



5

Our analysis is done with vectors only. We make similarity checks between them. Our service does not target individuals themselves, but rather the most characteristic traits of a mass of individuals.



6

We can stream live or stored videos, both anonymised by blurring faces or whole bodies.

## FAQ

### **Does Ultinous store pictures taken of individuals for doing video analytics?**

*We don't store pictures, unless you want us to store anonymised videos. The short time we spend with pictures is the time we need to delete them irreversibly. That is, for a fraction of a second, most likely for some milliseconds.*

### **When and how do we delete pictures of individuals?**

*We delete them in a second if all goes wrong, but mostly much sooner. We delete irreversibly.*

### **Are there cases when Ultinous stores pictures of individuals?**

*We don't store pictures unless we are commissioned to do so by our partner, the data controller. If so, we store pictures with individuals being blurred out or completely hidden. That happens to restrict the identification of individuals as much as possible, if that is what you require us to deliver on.*

### **Can Ultinous anonymise individuals on pictures?**

#### **Can this be done in real-time?**

*Yes, we can either blur individuals or hide them behind placeholders (such as a black square for example). We pride ourselves to be able to do this very quickly, real-time and reliably even in a non-cooperative environment. The flexibility of our solution is a great tool for data controllers to comply with the data protection by design and by default principle laid out in the GDPR*

### **Can the numeric vectors (into which Ultinous transforms original photos) be reverted to the original pictures?**

*It is our neural model that turns the picture into a vector. In theory, one might turn the vector back to the original picture. However, this would require such an unreasonable amount of resources that could well exceed that of buying all the lottery tickets to win the main prize. It is safe to say that getting the vector out of a picture is, in practice, a one-way transformation. No vector can reasonably be turned back into its original picture.*

## Legal disclaimer

Please bear in mind that nothing here is intended to provide you with, or should be used as a substitute for legal advice. In data protection matters, please always seek the advice of a legal professional qualified to practice in the given jurisdiction. Ultinous expressly excludes any liability for using the information above as legal advice.



**For more information**

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