

Vehicle Classification Pilot Project Privacy Statement

What is the Traffic Classification Pilot Project?

Dublin City Council are responsible for traffic management. To fulfil this responsibility we need to understand how vehicles move around our City.

This is a “proof of concept” project that will explore how we can use ‘smart’ cameras – cameras enabled by artificial intelligence (AI) software– to count and classify traffic, and to assess lane discipline.

The project will see the temporary deployment (September – December 2020) of 2 smart cameras on Bachelors Walk and St John’s Road West.

Over the course of the trial we are testing the ability of the two cameras to:

1. Count the number of vehicles within view.
2. Classify the types of vehicles within view (bus, taxi, car, and bicycle).
3. Count the number of bus / cycle lane infringements.

This project is **not concerned with enforcement** and does **not involve the monitoring of number plates**.

The objective of this project is to **test the viability of the technology**.

Why do we have a Privacy Statement?

This privacy statement intends to demonstrate Dublin City Council’s firm commitment to privacy and to assure you that in all your dealings with us we will endeavour to ensure the security of the data you provide to us.

Any personal information which we process will be treated with the highest standards of security and confidentiality, strictly in accordance with the General Data Protection Regulations (GDPR) 2018 and the Data Protection Acts 2018.

How will the Traffic Classification Pilot Project process your data?

1. What personal data do we need?

The two cameras will process all images within view for the duration of the trial. This will include personal data such as images of individuals and number plates of private vehicles.

2. How will we process your personal data?

2.1 Installation and Configuration

The video live stream, which **includes personally identifiable data** within the cameras' view, will be accessed by select personnel from Dublin City Council, Data Processor 'Arm' and Sub-Processor 'SmartDTV' for the purposes of installation and configuration of the camera devices. This will ensure that the cameras are functioning and positioned correctly. No footage accessed during installation will be saved or stored.

2.2 Real-time counting, classification and lane infringement identification

For the duration of the trial, the artificial intelligence (AI) software will process the live video stream; counting, classifying and identifying lane infringements. This is an automated process. Results from this processing will be subsequently displayed on a dashboard accessed by Dublin City Council and Data Processor 'Arm'. The dashboard results will **only include anonymous data** including the number of vehicles viewed, classification of vehicles, the number of lane infringement incidents and their relevant timestamps.

2.3 AI Tuning and Configuration

Throughout the trial the artificial intelligence (AI) will be tuned and configured. This means the software will be trained to improve the accuracy of its results.

At set times as required during the trial, a number of hours of raw video footage will be recorded and stored. This footage **will include personal data** within view of the cameras. This footage will be used for training of the AI to produce more accurate results. At the end of the trial the footage will be permanently destroyed.

2.4 Validation

At set times as required during the trial, a number of hours of raw video footage will be accessed by Dublin City Council. This footage **will include personal data** within view of the cameras. Dublin City Council will review this footage against the AI generated results to validate the accuracy of the technology.

At the end of the trial, any saved footage will be permanently destroyed.

3. The legal basis for processing the personal data

The legal basis for processing is "Public Task".

Roads Act 1993

Dublin City Council has direct responsibility for traffic management in the Dublin City Council administrative area and is a Road Authority pursuant to the Roads Act 1993. As such it has the responsibility and authority to safely and efficiently manage mobility of people and vehicles and to:

- Provide any amenity, structure or thing for the safety or convenience of road users.

4. Data Sharing

Apart from Dublin City Council the below third parties will process the data. The strict limitations of their processing is set out in a Data Processing Agreement.

- **Arm (Data Processor)** will access the video live stream for installation and configuration purposes (2.1) and will access recorded footage for AI tuning and configuration purposes (2.3).
- **SmartDTV (Sub-processor)** will access the video live stream for installation and configuration purposes (2.1)

5. Security

Dublin City Council and our processors implement adequate, documented security measures in order to ensure that your data is processed safely and legally.

6. Retention period

All recorded footage that includes personally identifiable information will be permanently destroyed at the end of the trial period (December 2020).

7. Your Rights

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your personal data:

- the right to access the personal data that we hold about you, together with other information about our processing of that personal data;
- the right to require us to rectify any inaccuracies in your personal data;
- the right to require us to erase your personal data;
- the right to request that we no longer process your personal data for particular purposes;
- the right to object to our use of your personal data or the way in which we process it; and
- the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

Please note that to help protect your privacy, before granting access to personal data and you may be asked for proof of identity.

Subject Access Requests

If you would like to exercise any of these rights, you can submit a written request outlining the specific details of the request:

Data Protection Officer, Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08 RF3F
Email: dataprotection@dublincity.ie
Tel: 01 2223775

All valid requests will be processed without undue delay and in any event within one month of receipt of the request. This period may be extended by up to two further months where necessary.

Right of Complaint to the Office of the Data Protection Commission

If you are not satisfied with the outcome of the response you received from the local authority in relation to your request, then you are entitled to make a complaint to the Data Protection Commission who may investigate the matter for you.

The Data Protection Commission's website is www.dataprotection.ie or you can contact their Office at:

Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois. R32 AP23.
E-mail: info@dataprotection.ie
Tel: 1890 252 231

8. Automated decision making

Data collected will not be used for automated decision making.

9. Transferred to a non EEA country

Your data will not be transferred to non EEA countries.

10. Further processing

The data collected throughout the trial will not be processed for any other purposes other than those outlined above.