

Personal data in panoramic images provided by Cyclomedia

Seznam.cz, a.s. ('Seznam') makes use of panoramic images taken from street level which are provided for by Cyclomedia Technology B.V. ('Cyclomedia'). Cyclomedia captures accurate visual data of the environment around you and transforms it into valuable insights. The capturing in Czech Republic is executed by Cyclomedia with its proprietary mobile mapping systems mounted on its capturing vehicles. In processing the imagery, Cyclomedia blurs faces and license plates of vehicles. Nevertheless, it may occur that some faces or license plates have not been adequately blurred and there may still be some (other) personal or otherwise sensible data visible in the images. Seznam provides these by Cyclomedia delivered panoramic images to the public i.a. via its online map application Mapy.cz. As the panoramic images may contain personal data, Cyclomedia and Seznam execute their activities in accordance with the requirements of the General Data Protection Regulation ('GDPR').

Cyclomedia commenced these activities in Czech Republic as of May, 2021. Panoramic images, which are published on Mapy.cz after that date, may therefore have been provided for by Cyclomedia. This is visible in the copyright notification on a specific image. Note that the capturing vehicles are fully managed and operated by Cyclomedia, however branded as Mapy.cz.

In this privacy policy, we explain to you how both Seznam and Cyclomedia deal with the protection of your personal data that may be visible in the panoramic images. We also inform you which party you can address in case you have any questions related to data protection.

GDPR and the role & legal basis of Cyclomedia and Seznam

The GDPR makes a distinction between a controller and a processor. A controller is a party who alone or jointly with others *determines the purposes and means* of the processing of personal data (art. 4 (7) GDPR). A processor is a party which processes personal data *on behalf of* the controller (art. 4 (8) GDPR). With regard to the panoramic images, Seznam and Cyclomedia each determine their own purposes and means for processing and have actual control over the images that they process without dependency on each other for this processing. Therefore, Seznam and Cyclomedia each qualify as a separate controller. This is further explained in this section along with the legal basis for processing, which is a key requirement of the GDPR for controllers processing personal data.

Cyclomedia determines the technical means by which the personal data are being processed, since the images are captured via its patented technology and are stored on servers controlled by Cyclomedia. Cyclomedia also determines which areas are included in the capturing, which customers gain access and how long the images are being retained in its own databases. Cyclomedia maps out areas in the aim to achieve full coverage of public streets. Cyclomedia has a legitimate interest to process personal data in street level photographs pursuant to article 6.1 sub f GDPR. This legitimate interest includes the

freedom to conduct a business as included in Article 16 of the Charter of Fundamental Rights of the EU and the resulting interest in being able to best serve its customers, other stakeholders and society as a whole. The data processing purposes consist of recording and processing street level photographs in a database in order to – under stringent conditions- make these photographs available to public and private organizations, like Seznam. For more information on Cyclomedia's privacy policy, we refer to the [Cyclomedia privacy policy](#) as published on its website. The Cyclomedia privacy policy provides further information on the purpose and lawfulness of processing, storage of the imagery and technical & organizational measures that Cyclomedia has in place to prevent unauthorized access.

Cyclomedia delivers a copy of the panoramic imagery of Czech Republic to Seznam, which in its turn stores these images in its databases and on servers controlled by Seznam. Seznam in this respect determines whether the images in their databases are useful or necessary, which part of the images are used and which authorized users get access. Seznam has a legitimate interest to process personal data in street level photographs pursuant to article 6.1 sub b and f GDPR. Seznam uses these panoramic images for its own business purposes, specifically publication of the imagery on Mapy.cz and/or other services provided by Seznam.

How your personal data is protected

In the panoramic imagery, privacy-sensitive information, namely faces of recognizable persons and license plates of vehicles, are blurred by Cyclomedia via state-of-the-art blurring technology. This blurring takes place on the raw data and is irreversible once executed. The panoramic imagery that is delivered to Seznam has been blurred.

In capturing and processing personal data and before Cyclomedia submits the data to Seznam, Cyclomedia has the following measures in place:

- storage of the raw visual material - before the execution of the blurring - in a non-open proprietary data format;
- separate processing of image material and other data;
- storage on strictly secured servers located within the European Union;
- restriction of access – unblurred data is accessible to a limited number of Cyclomedia staff for control of the data quality and quantity;

Furthermore, Cyclomedia has a procedure in place to correct any inadequate blurring upon request.

Seznam's measures regarding personal data in the panoramic imagery can be accessed [here](#).

Your rights and requests

If you are involved in the panoramic imagery as a data subject (for instance, because you have been photographed and the blurring algorithm has not detected your face or the capturing accidentally took place on your private grounds), you can request access, rectification, erasure, and restriction of processing and portability of your data. You can also raise an objection on grounds relating to your particular situation.

To report a request to Seznam, we recommend using the report an error button that appears in the lower right corner of the map on Mapy.cz. Further information can be accessed in [Panorama and privacy policy](#). Seznam's Data Protection Officer (DPO) supervises the adoption and compliance with the GDPR and can be contacted via dpo@firma.seznam.cz

As separate data controllers Cyclomedia and Seznam handle requests and objections of data subjects independently.

Seznam will forward your request to Cyclomedia in case your request is related to Cyclomedia's responsibilities in processing the data, such as requests related to the actual capturing of the data by Cyclomedia, for instance when a capturing vehicle has accidentally accessed your private grounds without permission or requests related to Cyclomedia providing the imagery to other clients.

Cyclomedia will forward your request to Seznam in case your request is related to the use of the panoramic imagery on Mapy.cz and/or other services provided by Seznam.

In addition, you can also issue requests and raise objections to the capturing and processing of your personal data by Cyclomedia directly to Cyclomedia. You can do this by e-mail to privacy@cyclomedia.com.

Cyclomedia has appointed an internal supervisor on the processing of personal data, a Data Protection Officer (DPO). The DPO supervises the adoption and compliance with the GDPR and can be contacted via privacy@cyclomedia.com.

In handling requests or objections, either Seznam or Cyclomedia may ask you to prove your identity, in order to prevent abuse.

You have the right to lodge a complaint with the relevant data protection authority (in Czech Republic for Seznam and in the Netherlands for Cyclomedia).

We reserve the right to modify this Privacy Statement. Any changes will be published on this website.