cyclomedia
Geo Data Driven Insights

Street Smart Privacy Statement: protection of privacy and information security

This Street Smart Privacy Statement describes the protection of privacy and information security concerning the data processed by Cyclomedia at customer- and user level while using the Street Smart application, API or App. It explains why certain data are processed, how these data are stored and secured and which rights persons whose personal data are processed have in relation to these data. The privacy aspects concerning the processing of personal data in visual material (GeoCycloramas), which are gathered on the public road and are put at the disposal of users via Street Smart, are not a part of this Privacy Statement. For more information thereupon, please visit our website.

The protection and security of the data of our customers and users of Street Smart are essential parts of Cyclomedia's services. Cyclomedia processes personal data in accordance with its privacy and information security policy and any statutory and other rules that may apply, including the European General Data Protection Regulation (GDPR). The information security is based on the ISO 27002 Code of practice for information security controls. Cyclomedia has appointed a Data Protection Officer who supervises the application of and compliance with privacy rules and regulations within Cyclomedia. The management system for information security of the Cyclomedia company that manages the Street Smart service is ISO 27001 certified.

1.   Purposes for processing and legal basis

The data of customers and the personal data of customers' employees are processed by Cyclomedia for entering and executing agreements concerning the Street Smart services by Cyclomedia and the management of the relations resulting from it. Cyclomedia has a legitimate interest to process these data, because this is needed to fulfill the agreement and to provide the Street Smart service. For instance, to perform its services, Cyclomedia must:
-   provide employees of customers access codes for Street Smart;
-   record how Street Smart is used for purposes of billing, management, maintenance and improvement; and
-   provide information to administrators and/or users at the customers in case of outages or planned innovations or modifications.

By entering an agreement with Cyclomedia for Street Smart, the customer accepts that the aforementioned data will be processed.

2.   Types of data

For Street Smart services Cyclomedia processes 'ordinary' personal data and information, which are categorized as 'Identifiers':
- contact details: name and email address of the employees of the customer;
- access codes & passwords for Street Smart (not in case 'Single sign-on' has been implemented);
- log data of users of Street Smart;
- IP address of a user of Street Smart for as far as traceable to a natural person.

By using the Street Smart mobile app, location data of the mobile phone are being used to determine where the user is located on the map. These data are not stored by Cyclomedia.

3. Storage and security

Two different databases store and secure the data of customers and users of Street Smart: the 'account management database' and the 'usage statistics database'. These databases are located in our cloud environment at a third party, Microsoft Azure, with storage facilities in Western Europe via the Cyclomedia head office in The Netherlands. Microsoft Azure is certified according to the ISO27000 guideline. We periodically screen our cloud environment to ensure that the security is and remains adequate.

The account management database and the usage statistics database:
- are separate databases;
- are only accessible based on roles;
- use SSL and Client IP filtering for access security.

Account management database

The account management application is used to create customers and users who are allowed to use Street Smart. To this end, data of customers are being recorded, such as the name of the customer, email address of the contact who receives the access codes and the encrypted password for access to Street Smart. The account management database further records whether the application itself or the API is used, which functionality is applied and which user settings are applicable. These usage data are used for statistical analysis concerning the use of the different image databases and the used functionalities . To get insight into the access of the imagery in the account management database, data from the usage statistics database are used, namely the number of views. In the account management database it is not recorded nor displayed at which location a user has searched or viewed; so it will not be known when and which images a user has accessed.

Access to the account management database is based on roles and dependent on the function fulfilled within Cyclomedia. Further, administrators at the customer have access to the account management database.

Usage statistics database

The usage statistics database logs the use of the database and is the 'source file' of the usage data. This database records various parameters, such as:
- TimeStamp (the moment at which a certain functionality is applied);
- UserKey (user identification);
- ResponseTime (time frame in which the requested server obtains a response);
- LayerType (type of data layer, such as the Cyclorama data layer);
- ImageID (identification number of the image);
- Action (type of functionality that is being used);
- Zoomlevel (zoom level of the visual material that is being viewed);
- Application (type of application that is being used, such as Street Smart the API);
- Source IP-address of the customer.

No direct location information of a viewed object is recorded, such as an address or a zip code. The data in this database are used to supply the account management application with data about its use. The link between the databases is established by means of a unique personID linked to a user. Only Cyclomedia administrators have access to this database.

4. Transfer of data

For the performance of the services transfer of data may take place to other Cyclomedia entities, which are bound to the same way-of-working as the Cyclomedia entity with which the customer has entered the Street Smart agreement. In addition, transfer of data takes place by means of storage at the cloud service provider Microsoft Azure as far as it concerns data in the account management database. To this end, adequate data processing arrangements are in place with Microsoft to protect the personal information processed on behalf of Cyclomedia.

5. Retention periods

Cyclomedia removes the (personal) data of customers and users of Street Smart one (1) year after a customer is no longer a customer. From that moment on, the usage data can no longer be traced back to an individual user.

The statistics as recorded in the usage statistics database are stored for 18 months.

6. Cookies Street Smart website

The Street Smart website uses cookies. These cookies are needed to measure Street Smart performance, analyze the use of Street Smart and align the development of Street Smart with the users' needs. Cyclomedia uses AppDynamics cookies. AppDynamics allows us to measure user experience, such as the website loading speed or failure of the service. Further, AppDynamics cookiers are used to for instance analyze from which country our service is consulted and which browser is used. AppDynamics cookies are only stored per session and deleted thereafter. In addition, Cyclomedia uses cookies from Amplitude to learn how Street Smart is used, e.g. how a user navigates between different functionalities. The information collected with AppDynamics and Amplitude does not include IP-addresses or other data that may be traceable to a natural person. Further, the Hotjar service is used to ask users for targeted feedback on the Street Smart services and to facilitate user surveys. When using the Hotjar service, IP addresses of users are being suppressed before being processed. This involves replacing the last octet of IPv4 addresses (all connections to Hotjar are made via IPv4) with a 0 to ensure that the full IP address is not stored.

7. Rights of Street Smart users

A Street Smart user of whom Cyclomedia processes personal data, has the right to request Cyclomedia for access, disclosure, rectification, erasure, deletion, restriction of the processing, or data portability.

You can direct your written request to the use of personal data as follows: by email to info-us@cyclomedia.com, or using the contact page on our website or by mail to the address below:

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When you request access or disclosure, Cyclomedia may - in order to prevent misuse and verify the request - ask for additional proof of identification. Should the personal data processed by us contain inaccuracies, you can request Cyclomedia to rectify or remove the incorrect data.

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