

### Processing of personal details in our photography from the public road

Cyclomedia produces GeoCycloramas® (Cyclomedia's 360-degree panoramic images) taken from the public road and makes use of public geometric and land-registry data. The street level images may also record personal data, on the basis of which Cyclomedia conducts its activities in accordance with the requirements of federal and state laws, statutes, bills and guidelines on data privacy ('Data Protection Regulations'). In the street level images collected by Cyclomedia, faces and license plates are made unrecognizable via 'blurring' to the extent required by Data Protection Regulations. GeoCycloramas® reflect the environment as on the day the pictures are taken. Cyclomedia does not make video recordings and the images gathered are not real-time. Once the images have been gathered, these are processed, transferred to a database and ultimately provided to Cyclomedia customers via a restricted access online platform.

Cyclomedia takes its pictures from the public road, except in cases where Cyclomedia collects imagery from private property on behalf of an entity where we are given legal authority as their agent to do so. An example of this is when a local government (i.e., City or County) hires us to capture imagery for their property valuation work in lieu of sending their own staff to every property. Our vehicles may also sometimes capture imagery of utilities and nearby vegetation to help manage vegetation trimming to reduce the risk of wildfires. In this case the utility will give us permission to enter utility easements.

### Purpose of the data processing

Cyclomedia takes photographs from the public road in order to map the environment providing current and clear views of street level environments readily from the web. 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.

The image material collected by Cyclomedia provides a better understanding of the outdoor space and thus contributes to a social interest in better understanding and absorbing the increasingly complex and rapidly changing environment. In order to arrive at future-proof solutions for current themes in the field of climate change (e.g. the amount of green space in urban areas), mobility (e.g. parking facilities for electric vehicles), livability (e.g. type of buildings and green areas) and safety (e.g. adequately maintained roads and assets and escape routes during incidents or events), a transparent, accurate and complete overview of the outdoor space is necessary. In short, the interests of society as a whole benefit from the data processing carried out by Cyclomedia. A number of examples illustrate the importance of the use of street level photographs by Cyclomedia's customers:

- Local governments: performance of public duties relating to the outdoor space, where it is necessary for them to have an unambiguous and accurate picture of this outdoor space. This enables the municipality to serve its citizens better, among other things by means of efficient and effective property appraisal, urban planning, public asset management and flood mitigation.
- Utilities: comprehensive inventory and performing proper maintenance of utility assets by using detailed visualization of overhead infrastructure, surface features, vegetation

and site conditions improving safety, reliability, service quality and customer satisfaction.

- Departments of Transportation: identification of assets of interest, their condition, and exact location (road surface conditions, guardrails, pedestrian ramps etc.) and leveraging this information to ensure the best overall condition of the road network.
- Telecommunication companies: construction and management of telecom networks, such as fibre optic and 5G networks that serve a social interest and that can be better prepared and realized through visual inspection and analysis of the entire outdoor area by means of Cyclomedia's images.

In order to be able to visualize the outdoor space on a large scale, thoroughly and in high quality and to be able to offer this (blurred) image material to customers in a database via a closed platform, it is necessary to process the (personal) data that is visible from the public road. This is necessary in order to be able to generate an overview of the outdoor space in such a way that it is comparable to what a person observes when he or she physically visits the same location.

In addition, the processing of certain data, which may sometimes be regarded as personal data (including houses combined with address information), is necessary in view of the purpose for which these images are used, such as:

- Local government for purposes of:
  - exercising property appraisal;
  - registration of addresses and buildings;
  - issuing and enforcing various permits, such as building permits, entrance permits, felling permits and advertising signs;
  - inspection of building plans;
  - verification of development plans;
  - (re)development of municipal areas.
- Utility and telecom suppliers for the planning, realization, maintenance and repair of home connections;
- Engineering companies for assessing the impact of a project on existing buildings.

The interests of Cyclomedia and third parties, including society as a whole, are weighed by Cyclomedia against the interests and the fundamental rights of citizens in relation to the protection of personal data. It plays a role in this respect that virtually all data visible on the imagery cannot be regarded at all or only as insensitive (personal) data that is already visible in the outdoor space. As a result, the potential adverse consequences and risks for citizens involved are minimal.

### Data security and storage

Cyclomedia has put in place various safeguards to prevent and limit any undesirable consequences for citizens as much as possible. Faces and license plates may be considered personal data under applicable Data Protection Regulations and are not relevant to the purpose of the processing. In case Cyclomedia is to provide streetlevel imagery to its customers, Cyclomedia blurs faces and license plates in that imagery to the extent required by applicable Data Protection Regulations. To achieve such blurring, Cyclomedia uses an advanced software tool developed in-house that automatically detects faces and license

plates in the images and makes them unrecognizable. Cyclomedia's images are not publicly available and customers are granted access only to the geographical areas within the imagery database which they need for their own purposes.

The street level photographs produced by Cyclomedia are stored in order for Cyclomedia to fulfil its purposes of processing and its contractual obligations with customers. Cyclomedia has set up various organizational and technical measures to ensure that unauthorized access to the data can be prevented:

- Storage of the raw visual material - before the execution of any blurring - in a non-open proprietary data format;
- Separate processing of image material and other data;
- Storage on strictly secured servers;
- Restriction of access for individual users via username/password;
- Informing employees of their obligations regarding the lawful processing of the image material and the data derived from this material;
- Establishing a reporting process for security incidents (data breaches).

#### Information and supervision

Depending on the country in which Cyclomedia captures street level imagery, Cyclomedia uses different types of media to inform the public about its activities.

#### Your rights

If you as a citizen are involved in our images (for instance, because your house has been photographed or because you think you yourself are visible within our photographs), you can request access, correction, deletion and limitation of processing. In addition, you can raise objections to the use of your personal data. You can do this in writing: by e-mail to [info-us@cyclomedia.com](mailto:info-us@cyclomedia.com), through the contact page on our website, or by post to the following address:

Cyclomedia Technology Inc.  
8215 Greenway Blvd, Suite 300,  
Middleton, WI 53562

If you have an access request, we may ask you to prove your identity, in order to prevent abuse.

You have the right to lodge a complaint with the applicable enforcement authority in relation to the execution of your privacy rights with us.

## FAQ's

### **1. I believe Cyclomedia has gathered images from my private grounds. How can I request for these images to be removed?**

We are only allowed to take pictures from the public road except in cases where we are collecting imagery on behalf of an entity where we are given legal authority as their agent to do so. An example of this is when a local government (i.e., City or County) hires us to capture imagery for their property valuation work in lieu of sending their own staff to every property. Our vehicles may also sometimes capture imagery of utilities and nearby vegetation to help manage vegetation trimming to reduce the risk of wildfires. In this case the utility will give us permission to enter utility easements. If you believe we may have accidentally captured imagery from private property, please contact us with location information such as an address at [info-us@cyclomedia.com](mailto:info-us@cyclomedia.com).

### **2. The Cyclomedia vehicle drove onto my driveway. Why?**

Cyclomedia contracts with local governments to collect imagery to support their property valuation responsibilities. When compared with sending their own staff into the field, imagery collection by Cyclomedia provides a faster, more economical method for collecting the information to make a fair and equitable determination of property value. In this case, our crews carry ID badges and documentation from the local jurisdiction. We proudly hire local veterans where possible, and all drivers have background checks.

### **3. I am visible in a picture, and I would like to file a complaint regarding this visibility, how can I do this?**

You can send an email with your request to [info-us@cyclomedia.com](mailto:info-us@cyclomedia.com) and will check and evaluate your request.

### **4. What can I do if an image contains inappropriate content?**

Please send your request by email to [info-us@cyclomedia.com](mailto:info-us@cyclomedia.com) and we will consider your request.