



2019 Privacy Impact Assessment

SenSource People Counters

Seattle Parks and Recreation



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Privacy Impact Assessment overview

What is a Privacy Impact Assessment?

A Privacy Impact Assessment (“PIA”) is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. It asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

When is a PIA required?

A PIA may be required in two circumstances.

- The first is when a project, technology, or other review has been flagged as having a high privacy risk.
- The second is when a technology is required to complete the Surveillance Impact Report process. This is one deliverable that comprises the report.

How to complete this document?

As department staff complete the document, they should keep the following in mind.

- Responses to questions should be in the text or check boxes only, all other information (questions, descriptions, etc.) should **NOT** be edited by the department staff completing this document.
- All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

1.0 Abstract

1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

People counters Upgrade Project: This project will upgrade and replace existing people counter devices in the City's recreation facilities that are technologically obsolete and have no vendor support. The devices are installed in community centers, pools, and other facilities to track relative usage of facilities across time. Data from the counters is used to inform management and business decisions on programming, managing, and operating our recreational facilities.

1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.

A Privacy Impact Assessment is required for this project, as it has been flagged as having high privacy risks associated with this. These risks are primarily driven by the *potential* functionality of the technology, in that the option to capture live video and images of members of the public entering recreation facilities exists.

This PIA will detail the policy, privacy best practices, and technical privacy protections, Seattle Parks and Recreation will utilize in the implementation and use of the People counters technology to address any potential privacy concerns.

2.0 Project / Technology Overview

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed

2.1 Describe the benefits of the project/technology.

Seattle Parks and Recreation (SPR) manages dozens of recreation facilities open to the public. We need to distribute staffing and resources based on a variety of factors, but one major factor is facility usage. This technology allows us to track traffic across time and across facilities. We use this data to understand which centers are growing in use and which are declining, to identify problems and issues, and to allocate staffing relative to need.

2.2 Provide any data or research demonstrating anticipated benefits.

This is a standard technology across several industries that manage facilities open to the public. More importantly, it is a replacement for an existing technology that we already use – meaning the benefit has already been proven. The data has been used as one of our performance measures on the Mayor's Performance Seattle Dashboard, is regularly requested by the City Budget Office or City Council Central Staff and helps inform our annual budget process.

2.3 Describe the technology involved.

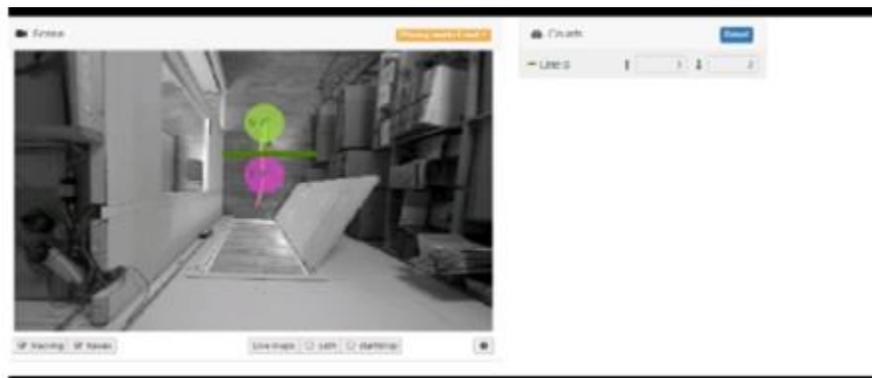
The technology used is ClearCount 3DX from:

SenSource Inc.
3890 Oakwood Ave.
Youngstown, OH 44515 800.239.1226 | sales@sensourceinc.com www.SenSourceInc.com

The devices are white, 5.12" x 3.70" x 1.18" inch boxes that are installed over a door attached to the roof or a mounting structure.

The devices do not collect or track any Personally Identifiable Information (PII)—identifying only that a moving object is a person with a certain height (differentiating adults from children) and the direction of movement (in or out). No video stream leaves the devices and only metadata is sent out.

The devices will be configured to ensure privacy as shown in the picture below – still image taken at device power on to use as generic background for Tracking Paths and troubleshooting and no recognizable facial or body features, only blobs crossing lines.



2.4 Describe how the project or use of technology relates to the department's mission.

Seattle Parks and Recreation's mission is to provide welcoming and safe opportunities to play, learn, contemplate and build community, and promotes responsible stewardship of the land. Our recreation facilities are at the heart of that mission, and this technology allows us to use data-informed management to keep those facilities staffed appropriately.

2.5 Who will be involved with the deployment and use of the project / technology?

The following teams will be involved with the deployment of the technology:
Seattle Parks and Recreation Strategic Advisors – creating reports, analyzing data
Seattle IT Network Engineers – installing devices, and ensuring network connectivity
Seattle IT Business Intelligence Analysts – aggregating and analyzing data

3.0 Use Governance

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities are bound by restrictions specified in the Surveillance Ordinance and Privacy Principles and must provide written procedures for how the entity will comply with any restrictions identified.

3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.

A notice will be posted on the premises the equipment is deployed in plain sight. The notice language is as follows: "People counters are in use at this facility to monitor and improve our services. The counters do not sense or collect personally identifiable information. For more information, please visit Seattle.gov/privacy."

3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.

This question is not applicable.

3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.

Equipment maintenance and troubleshooting training, report generation and management is provided by the vendor and taken by assigned City staff.

4.0 Data Collection and Use

Provide information about the policies and practices around the collection and use of the data collected.

4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other city departments.

All data is collected through the Sensus people counter. This data may be combined with other data obtained through operational systems such as SPR's Recreation Management and Asset and Work Order Management systems and others to provide better insight into usage, cost and other related data.

4.2 What measures are in place to minimize inadvertent or improper collection of data?

Device configurations are set and tested at installation time to ensure that data is being collected properly and accurately.

4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

Seattle Parks and Recreation Leadership will determine when the technology is deployed and used. As this is replacing an obsolete legacy system that is no longer supported, there is immediate need to deploy this technology.

4.4 How often will the technology be in operation?

Once installed and configured, the technology will be in operation continuously at all times, until it is no longer functional, removed, or replaced. Data (numeric counts of visits only) will be pulled from the system as needed – generally monthly and quarterly.

4.5 What is the permanence of the installation? Is it installed permanently or temporarily?

It will be installed as long as it is functional and considered useful. At this time, we anticipate it will remain in place until it is no longer functional or is replaced.

4.6 Is a physical object collecting data or images, visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?

The technology is and will be visible to the public, just as the currently obsolete systems are. There will be signage indicating the use of the technology on premises it is deployed on. The notice language is as follows: **“People counters are in use at this facility to monitor and improve our services. The counters do not sense or collect personally identifiable information. For more information, please visit Seattle.gov/privacy.”**

4.7 How will data that is collected be accessed and by whom?

Data will be stored in the vendor’s cloud. Raw data (numeric counts only) will be accessed by a small number of employees – including IT staff to check on system functionality, and analysts within SPR. Reports generated by SPR business / data analysts will contain aggregate information that may be shared with other SPR managers and coordinators of community centers.

4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols. Please link memorandums of agreement, contracts, etc. that are applicable.

The user support agreement outlines details regarding system access and other information applicable to question 4.8.



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4.9 What are acceptable reasons for access to the equipment and/or data collected?

When equipment malfunctions, the vendor will work IT staff who may access for troubleshooting and recalibration as necessary. Data (numeric counts only) may be available for SPR coordinators to understand traffic flows, and for the City Budget Office (CBO) or other decision-makers to understand volume of use in order to appropriately allocate resources.

4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) and to provide an audit trail (viewer logging, modification logging, etc.)?

The technology provides access control by way of point to point encryption. SPR will control who has access to data. Authorized staff will have accounts with passwords to access the data and reports.

5.0 Data Storage, Retention and Deletion

5.1 How will data be securely stored?

The data will be password protected.

SenSource will ensure that the data is stored securely on SenSource's Cloud environmentt:

- i. Ensuring appropriate separation of application, database, and other component servers.
- ii. Limiting access to endpoints of key servers to other related components. (No direct access to endpoints of database servers).
- iii. Enforce HTTPS for all application pages.
- iv. Use of Secure FTP for integration purposes (optional feature).
- v. Eliminating the use of default passwords and enforcing hard password requirements for any application components requiring password based authentication.
- vi. Use of advanced application monitoring system to identify and alert on suspicious activity within the application.
- vii. Invitation only registration flow ensures users cannot "stumble" across the application and begin to use it.
- viii. All public endpoints are protected from DOS attacks using a popular library for this type of prevention.

5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?

The City Auditor may audit for compliance as appropriate.

5.3 What measures will be used to destroy improperly collected data?

This question is not applicable.

5.4 Which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?

Per the City Records Management Program and City records retention policy, the raw count data stored in the vendor cloud will be retained for the life of the contract. Data used for reporting will be retained for up to five years after it is deemed irrelevant by Seattle Parks and Recreation.

6.0 Data Sharing and Accuracy

6.1 Which entity or entities inside and external to the City will be data sharing partners?

This question is not applicable. The data will not be shared internally or externally.

6.2 Why is data sharing necessary?

This question is not applicable.

6.3 Are there any restrictions on non-City data use?

Yes No

6.3.1 If you answered Yes, provide a copy of the department's procedures and policies for ensuring compliance with these restrictions.

This question is not applicable.

6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?

This question is not applicable, as SPR will not have any data sharing partners through the implementation of the project or use of the technology.

All data requests external to the City would need to come in accordance with the Washington State Public Records Act.

6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.

SenSource and City of Seattle staff will perform the initial system configuration and test for its accuracy before acceptance. After installation and in operation, SenSource will continuously monitor for problems with network connectivity and system performance and identifies and resolves any issues in partnership with City staff.

6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.

This question is not applicable. Data is anonymized; therefore we are unable to identify individuals' information.

7.0 Legal Obligations, Risks and Compliance

7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?

This question is not applicable.

7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.

Seattle Parks and Recreation staff are required to take the annual City-wide privacy and security awareness training.

7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

Since no PII related data is gathered, there are no risks identified.

7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?

The presence of the people counter technology above the entrance as residents are entering may be noticed and cause concern for personal privacy. In order to address those concerns, SPR is posting notification signs stating that the technology is in use upon entry to the facility. In addition, the technology does not collect identifiable images.

8.0 Monitoring and Enforcement

8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

A log of public disclosures is maintained in the City's GovQA platform, which tracks all requests and responses.

8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

SPR staff will perform auditing is done from time to time if more or less than usual data is reported and analyzed and if need be investigated and remedied.