

What is Hugh Lane Gallery Space Analytics Project?

This is a 'proof of concept' project. This means that we are testing new technology to try and improve the service that the Hugh Lane Gallery provides to the public.

As a gallery, it is important that we use the space we have in the best possible way. We are trialling seven new cameras that will provide 'analytics' (information) about how many people visit our gallery and what spaces are most popular or most underused. The camera technology incorporates "privacy by design" principles and does not store and record any images, instead, the camera identifies and counts objects.

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 we will the Project process your data?

1. What personal data do we need?

None, no personal data (images) are recorded or stored.

2. How will we process your personal data?

The cameras carry out "object detection", this means the technology can identify and tell the difference between people and other objects.

No images of individuals within the line of sight of the cameras will be recorded or stored.

Instead, on the camera device, the objects detected are processed into anonymous data (e.g. the camera detects 4 objects that are people in room 1).

This anonymous data is then visualised on a computer so that gallery staff can understand how the space is being used.

No images of individuals are recorded or stored as part of this trial project

3. The legal basis for processing the personal data

The Legal Basis for processing this data is "Legitimate Interest".

The Hugh Lane Gallery needs to understand how the space is used and how the space can be improved in order to continue providing quality services to the public.

4. Data Sharing

Arm Ltd. are the industry partner for this project and provide the cameras.

The scope of this partnership is outlined in a Project Data Processing Agreement.

Arm staff will only have access to camera feed during commissioning (set-up) which will be done on site.

5. Security Measures

The recognition software is designed and tested to best security practice and is independently audited to demonstrate this.

All network data is encrypted using industry standard techniques and the software is protected by multi-factor access control.

6. Retention period

No personal data is retained as part of this project.

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:

Postal Address: Data Protection Officer, Dublin City Council, Civic Offices, Wood Quay, Dublin 8

Email: dataprotection@dublincity.ie

Phone: 01 222 3775

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:

Postal Address: Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois. R32 AP23.

E-mail: info@dataprotection.ie

Phone: 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 processed for this project will not be processed for any other purposes other than those outlined above.