

Patent no. 341403



Privacy policy

AbleCenter® AC-02 and AC-03



AbleCon AS | PRIVACY

Product models AbleCenter® AC-02 and AC-03

Product version: 2.1 | Updated 31.03.2023

Contactt info: www.ablecon.no | service@ablecenter.no | support tel: +47 400 82 011



AbleCon.no
- enable you!

Data controller is Ablecon AS (Norway) and AbleCenter VisioSales AS.

We do not collect contact information from the user of AbleCenter® AC-02 and AC-03. We only collect data necessary for correct invoicing and customer support.

AbleCenter® AC-02 and AC-03 is developed with privacy as base principle. We have implemented a number of security features to protect the collected data.

Here you can find out more about data we collect, security measures we implement and which rules apply when NAV aid centres, private persons, companies, organisations, schools, or municipalities purchase AbleCenter® AC-02 and AC-03.

Personal information (GDPR).

When AbleCenter® AC-02 and AC-03 is in use, a direct video feed is transmitted from the AbleCenter-device to a dedicated AbleCenter app/software that the pupils and employees use on their PC, tablet or mobile phone in the same room/classroom. This means that the network is local inside the building in the same way as any home network. The AbleCenter network is not used to access the Internet or connect to other servers or networks. The AbleCenter network is only used for transmitting the video feed from the AbleCenter-device to the users' PC or tablet at the desk in the same room. The video feed is end-to-end encrypted, to ensure that no-one else than the user of the AbleCenter app/software gains access to what happens in the classroom. At the outset the video feed can not be save, neither by AbleCon As, the user or others. However, if this feature is needed, it can be activated by AbleCon AS.

We gather only name and contact information about our customers, which for instance can be NAV aid centre, school, organisation or municipality. We usually do not know who the user of AbleCenter® AC-02 and AC-03 is, but only who the AbleCenter device was purchased by. If Ablecon AS is given the job of installing and provide basic training in the use of our system, our specialists will, as a result of this know who the user is, but this information is not saved anywhere at Ablecon AS All future follow/up and training is delivered based on orders from the purchaser of the system, for instance NAV aid centre or school/educational facility. The AbleCenter software/app collects only data necessary for customer support and correct invoicing.

Data that is collected:

- Name of the purchaser, order number and reference number.

The information is only related to the AbleCenter® AC-02 and AC-03 serial number and purchaser, and it is therefore not possible to identify who the software/app user is.

Data can at any time be deleted upon request by sending an email to service@ablecenter.no.





Embedded PRIVACY

To safeguard the privacy of users and people connected to the system, and ensure the video feed is as secure as possible, we have implemented a number of security measures.

Some examples include:

- The system can be switched off and on with the enclosed remote control unit.
- End-to-end encryption of video feed.
- Possible to save up to 9 fixed positions/camera angles and zoom levels.
- Possible to lock the camera to 9 fixed positions (educational objectives).
- Possible with wire connected communication and control via the electrical grid.
- The system can be limited to only one active user at a time.
- Password protected login for AbleCenter software.
- Password protected login for wireless network.
- Possibility to record video feed is deactivated as standard (can be activated when needed).
- «Take picture» function active as standard. Can be deactivated by the educator/administrator.
- Choice of server and security.

Specialists and technical personnel at AbleCon AS sign a duty of confidentiality and have access to the information mentioned above. The information is never transferred to third parties except our data processors, unless as a result of compulsory legal requests. AbleCon will notify the registered persons by requests for information, unless specifically stated in the legal procedures that notification is illegal.

AC-03-device clearly indicates when the system is on and a user connected.

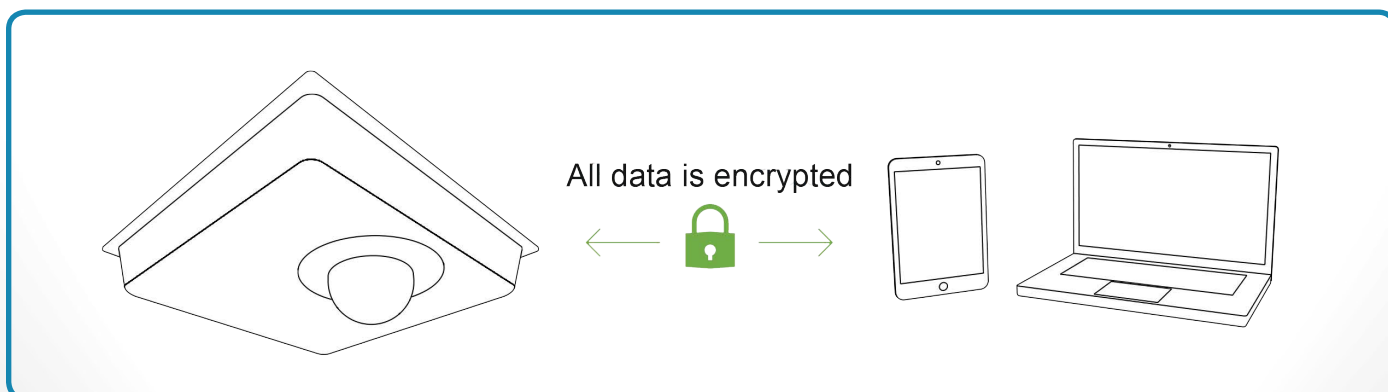
When the system is switched on a red lamp lights up on the AbleCenter-device. When a user is connected to the AbleCenter® AC-03, a green lamp lights up on the AbleCenter-device so that everyone around can see that the system is active.

AbleCenter® AC-02 and AC-03 can be switched off.

If use of AbleCenter® AC-02 and AC-03 is not required, the device can be switched off by the enclosed remote control. This limits the danger of compromising the security of the system.

End-to-end encrypted video feed.

The video feed that is transmitted between the AbleCenter device and the AbleCenter software/app on the PC/tablet, is end-to-end encrypted. This way we ensure that outsiders can not gain access to the video feed.



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Possibility to save up to 9 fixed positions.

AbleCenter® AC-02 and AC-03 can save up to 9 fixed positions/camera angles and zoom level using the numbered buttons 1-9. By selecting the number of desired setting, the camera moves automatically to the saved position and saved zoom level. This happens so fast that it is practically impossible to interpret the image from one position to another. By using fixed positions it is of course not possible to receive other information than that which is located within the saved position.

Possibility to lock the system to 9 fixed positions.

AbleCenter® AC-02 and AC-03 can be locked to fixed positions/camera angles that are saved and approved by the educator/administrator beforehand. This prevents user at home or outsiders from receiving images outside the pre-set fixed areas.

Possibility for wire-connected communication and control through the electrical grid.

If you do not wish to use the local wireless network to control the system and direct the video feed, this can be managed through a simple component that is plugged into a wall socket which communicates with a small unit plugged into the network port of the PC. This makes it impossible for intruders to gain access to this line, and the need for more internal networks is eliminated.

One user.

The device can only be connected with one user at a time through a fixed IP-address, but it is possible to open up for more if required. Be aware, that this reduces the security level of the system by some degree.

Password protected login for AbleCenter software.

In order to use the software/app for AbleCenter® AC-02 and AC-03 the software must be activated with a code from Ablecon AS.

Password protected login for wireless network.

In order to manage the system through the wireless network, one must log into an end-to-end encrypted network with SSID and password.

Nothing is saved.

AbleCenter® AC-02 and AC-03 is used in real time. The possibility to save the video feed is deactivated as standard, but can be activated by contacting AbleCon AS.

AbleCenter® AC-02 and AC-03 can be compared to a pair of binoculars that offer the chance for a person with vision impairment to see required positions in the classroom to take part in the education process on equal terms with other pupils and, to a certain extent, participate in the social life in class.

The «Take picture » feature is active as standard but can be deactivated by contacting AbleCon AS.

Your rights.

You have the right to ask for insight, correction and deletion of your personal information. Du may also complain to the Norwegian Data Protection Authority.

Personal data (GDPR).

Ablecon AS has conducted some research in connection with our camera systems for vision impaired pupils that have become very popular in Norwegian school. We have studied the regulations from NDPA connected to duty of information by the use of a camera in the classroom.

As we have also developed a system that can transmit video feed outside the building and home to home-based pupils (**AbleCenter® AC-03 with home control module**) where we use systems that transmit images and sound from the classroom to a homebased pupil, we felt it necessary to properly investigate responsibility and privacy issues. This was completed as part of a pilot-study preceding the development of **AbleCenter® AC-03 with home control module**.

We conducted a thorough mapping, mainly through web-based tools. We found a lot of information but in this connection we would refer to a statement from the Ministry of Knowledge dated 19.05.2017

https://www.udir.no/contentassets/65542c26255e-visni_ngen--brev-fra-kunnskapsdepartementet.pdf403d92a92238dbe25fb7/bruk-av-robot-i-under-

The statement is regarding the use of robot with the possibility of two-way transmission of sound and one-way transmission of video from the classroom to a pupil based somewhere else. This robot is designated AV1 and in the statement is referred to as either «robot» or «AV1».

We must here underline that this statement is regarding the use of robot with the possibility of two-way transmission of sound and one-way transmission of video from the classroom to a pupil based somewhere else.

This means that the data feed is sent outside the building and would therefore probably demand more in relation to privacy and security than AbleCenter® AC-02 and AC-03 which only communicate between two devices locally in the same room. Regarding AbleCenter® AC-02 and AC-03 we are therefore uncertain whether the Personal Information Act applies to the systems.

Camera based tools for pupils with vision impairment, both distance camera and closeup camera have been a natural part of classrooms, where there are pupils with vision impairments, for a number of years already. **As far as we are aware, these systems have not resulted that the Personal Information Act has been applied during all these years.**

We would still always refer to this statement, though, as it looks like areas covered by the Personal Information Act must be adhered to by the school or workplace.

In situations where this equipment is used for the school/education facility to fulfill its teaching obligations, it is the education facility that has processing responsibility for the processing of personal data. The way we interpret the statement from the Norwegian Data Protection Authority, it seems to cover the use of a system with the possibility of two-way transmission of sound and one-way transmission of images from the classroom to a student who is in another place, where the student can control the movement of the system and thus image sections and communicate with audio via network access. Where the purpose is for the student to be able to take part in the school's and school owner's educational process, the processing of personal data is not carried out for private purposes, but for training purposes. The Personal Information Act then applies and the school owner is responsible for processing, and must fulfill the obligations according to privacy regulations. The fact that the Personal Information Act applies, means that the school owner must ensure that the criteria in the Act are fulfilled.

Amongst other things, the Act stipulates criteria for basis for data processing, for instance acceptance (Personal Information Act §8 and §9) and information to those affected by data processing and storage (Personal Information Act §19) etc. As data processing responsible the school owner has, in addition, a number of obligations connected to internal control and information security (Personal Information Act §13 and §14).

From our point of view, this appears initially to be about providing good and accurate information and also collect user consent by the use of such tools. We have therefore developed written materials that make the information process easier for the school and work place. This information can be downloaded from our web page at www.ablecenter.no/privacy.

If use of the system involves the use of the school owner's network, the school owner must, among other things, decide what risk it entails to allow the use of ICT equipment on the school's network over which the school owner himself has no control. This assessment will be the same as for all other equipment (PCs, tablets and smartphones etc.) that staff and pupils use on the school's network, and which the school owner does not control.

In higher education it is normal that the students already at matriculation, have signed adequate consent forms regarding this. Adequate information to affected parties is critical.

By different uses in professional work life, this should be investigated closer by the employer.

Frequently Asked Questions (FAQ).

Below we have gathered answers to the most common questions.

When an educational facility/municipality has purchased and started using AbleCenter® AC-02 and AC-03, they must ensure that the criteria in the Personal Information Act are met.

What does the NDPA say.

The Norwegian Data Protection Authority stated the following about cases where a robot with the possibility of two-way transmission of sound and one-way transmission of images from the classroom to a student who is in another place, where the student can control the movement of the system and thus image sections and communicate with audio via network access, is used. Where the purpose is for the student to be able to take part in the school's educational process, the processing of personal data is not carried out for private purposes, but for training purposes. The Personal Information Act then applies and the school owner is responsible for the processing, and must fulfill the obligations according to the privacy regulations. The NDPA also stated the following about cases where AV1 (This robot has the designation AV1 and is referred to in the statement as either "robot" or "AV1") is purchased by the school/ municipality in 2017 :

"The school owner must ensure that the requirements in the Personal Information Act are met. Among other things, the Act requires a basis for processing, e.g. consent (Personal Data Act §8 and §9) and information to those affected, etc. (Personal Information Act §19). As data controller, the school owner also has a number of duties related to internal control and information security (Personal Data Act §13 and §14).

If use of the system means use of the school owners network, the school owner must consider the risk involved in allowing the use of ICT equipment that the school owner does not control."

<https://www.udir.no/contentassets/65542c26255e-403d92a92238dbe25fb7/bruk-av-robot-i-under-visningen--brev-fra-kunnskapsdepartementet.pdf>

Information to affected parties.

It is good policy to inform affected parties, but it is up to you how this is done. We have developed two draft information sheets where one is sent to teachers and pupils and the other can be sent to parents and next-of-kin at home.

Data processing basis.

This is a short summary of a longer evaluation of the data processing basis. Contact us by email to post@ablecon.no if you want to receive complete evaluation document.

Consent.

Consent from all pupils, teachers and others that may come into contact with the AbleCenter device during use, is one possible way for schools to ensure a valid data processing basis. Consent is though, but one of several alternative data processing bases defined in the Personal Information Act. Since AbleCenter® AC-02 and AC-03 is also used by children, consent might be unsuitable as data processing basis. Consent from children is not considered valid, and it would therefore be necessary that parents or legal guardians give consent on behalf of the child.

Justified interest.

Schools may also process personal data if there is a defined «justified interest».

It is AbleCon's evaluation that AbleCenter® AC-02 and AC-03 is designed in a privacy friendly way which at the same time fulfills an important purpose, namely to ensure that pupils with vision impairments can take part in education on equal terms with their class mates.

The use of AbleCenter® AC-02 and AC-03 is a good tool for meeting the criteria for adapted education, as set out in the Education Act (Education Act §1-3).

Based on this, it is the opinion of AbleCon AS that a clear «justified interest» exists for schools to start using AbleCenter® AC-02 and AC-03. It is still, though, the responsibility of the individual school to justify their own evaluation of whether «just interest» is present.

In the evaluation of whether a just interest is present, one must first consider whether the use of AbleCenter® AC-02 and AC-03 is «necessary», i.e. whether the purpose for using AbleCenter® AC-02 and AC-03 can be achieved in a less intrusive manner. Having considered whether the measures are «necessary» one must conduct an evaluation and balancing of interests between the school's desire to use AbleCenter® AC-02 and AC-03 and any negative privacy consequences for the affected pupils and teachers. Special consideration must be made for cases where the affected are under age.

Right to reject the use of AbleCenter® AC02 and AC-03 in school.

The wishes of the user must be key in this. Even if the school is basing their decision on «just interest» as processing basis, the individual pupil, teacher or parent has the right to resist the use of AbleCenter® AC-02 and AC-03 during school hours. The school is in such cases, entitled to continue using AbleCenter® AC-02 and AC-03 if it considers «compelling justified reasons» to be present. It is up to the individual school to consider whether this is the case or not.

Is a data processing agreement necessary?

During the use of AbleCenter® AC-02 and AC-03, AbleCon AS does not store any personal data on behalf of their users/customers. AbleCon only processes the following data to ensure good customer support and correct invoicing:

- Name of purchaser, order number and reference number.

AbleCon AS is data processing controller for the processing of this data and it is not necessary for our customers or dealers to enter into a specific data processing agreement with us.

Contact us

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