



**AbleCenter® AC-03**  
with home control module

Privacy policy 



**AbleCon AS | PRIVACY**

Product models: AbleCenter® AC-03 with home control module

Product version: 5.1 | Updated 31.03.2023

Contact info: [www.ablecon.no](http://www.ablecon.no) | [service@ablecenter.no](mailto: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-03 with home control module. We only collect data necessary for correct invoicing and customer support.**

AbleCenter® AC-03 with home control module is developed with privacy as base principle. We collect as little data as possible, and have implemented a number of security features to protect the collected data.

Here you can find out more about what personal 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-03 with home control module.

#### **Personal information (GDPR).**

When AbleCenter® AC-03 with home control module is in use a direct video feed is transmitted from the classroom between the AbleCenter device to a dedicated AbleCenter app/software that the pupils and employees use on their PC, tablet or mobile phone. 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 saved, neither by AbleCon As, the user or others. But if required, this feature can be activated.

We gather only name and contact information about our customers.

aid centre, school, organisation or municipality. We usually do not know who the user of AbleCenter® AC-03 with home control module 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 followup and training is delivered based on orders from the purchaser of the system.

Data that is collected:

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

The information is only related to the AbleCenter® AC-03 with home control module's serial number and purchaser, and it is therefore not possible to identify who the software/app user is. All data can at any time be deleted upon request by sending an email to local dealer or [service@ablecenter.no](mailto:service@ablecenter.no).





## EMBEDDED PRIVACY

To safeguard the privacy of users 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 through the software on the PC or tablet.
- 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.
- Administrator/educator can open and limit features that are available to the homebased user.
- 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 is active as standard, but can be deactivated.
- Servers and security. Operates with the remote platforms Teams and Zoom and their servers.

Specialists and technical personnel at AbleCon AS may have access to the information mentioned above. The information is never transferred to third parties unless as a result of compulsory legal request. 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.**

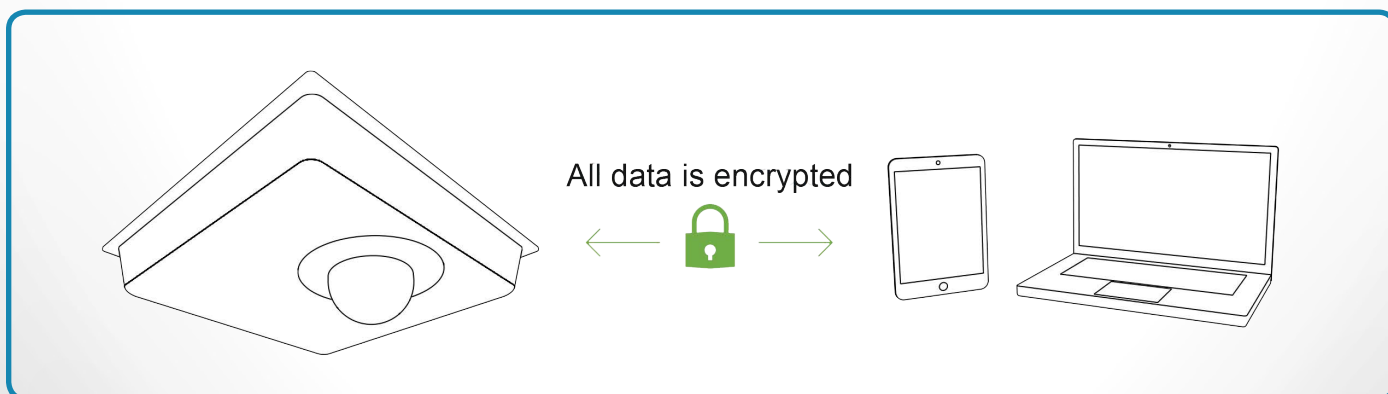
When the system is switched on a red lamp lights up on the AbleCenter-device. When a user is connected to the AbleCenter® AC-03 with home control module, a green lamp lights up on the AbleCenter-device so that everyone around can see that the system is active

### **AbleCenter® AC-03 with remote education module can be switched off.**

If use of AbleCenter® AC-03 with with home control module is not required, the device can be switched off through the AbleCenter® software, or by a button on 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 software/app on the PC/tablet and the AbleCenter AC-03 with home control module, is end-to-end encrypted. This way we ensure that outsiders can not gain access to the video feed.



**Possibility to save up to 9 fixed positions.**

AbleCenter® AC-03 with home control module 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-03 with home control module 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 preset 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.

**Educator/administrator can open and limit features that are available to home/based users.**

The educator/administrator can, through the AbleCenter software/app control which permissions are granted to home/based pupils. This includes everything from video feed to sound feed and control access to the system.

**Password protected login for AbleCenter software.**

In order to use the software/app for AbleCenter® AC-03 with home control module, 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-03 with home control module 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-03 with home control module can be compared to a pair of binoculars that offer the chance for a homemaker persons with different kinds of visual impairments to see required positions in the classroom and take part in the education process on equal terms with other pupils. They can to a certain extent participate in the social life in class.

The «Take picture» feature is active as standard but can be deactivated by the administrator/educator.

**Servers and security.**

The hardware and software for AbleCenter® AC03 with home control module, have an interface that operates in combination with the remote platforms Teams and Zoom and their servers.



## Your rights.

Customers have the right to ask for insight, correction and deletion of information based on orders from the purchaser of the system. You 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.

For AbleCenter® AC-03 with home control module we are talking about systems that transmit images and sound from the classroom to a pupil that is based somewhere else, so in our opinion it was necessary with a thorough examination relate to responsibility and privacy. This was conducted as part of the pilotproject for development for the systems.

Ablecon AS conducted a thorough mapping, mainly through webbased tools. They 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-403d92a92238dbe25fb7/bruk-av-robot-i-under-visni-ingen--brev-fra-kunnskapsdepartementet.pdf>

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»

AbleCenter® AC-03 with home control module are systems that maximise and simplify those features mentioned in the statement, in addition to other functionality. We therefore experience this statement as relevant for our remote education systems and will in the following underline some cuttings from this statement. These cuttings are taken out of a larger context, but we have to the best of our ability collected those parts that we feel are relevant to our systems.

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In situations where this equipment is used for the school/education facility to fulfill its teaching obligation, 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 webpage at [www.ablecenter.no/privacy](http://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-03 with home control module, they must ensure that the criteria in the PIA are met.

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 (robot designation in the statement is "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 IT 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](mailto: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 a possible way for schools to ensure a valid data processing basis. Consent is though but one of several alternative data processing bases in the Personal Information Act. Since AbleCenter® AC-03 with remote education module is also used by children, consent might be unsuitable as data processing basis. Consent from children is not considered valid, and it is necessary that parents or legal guardians 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-03 with home control module 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-03 with home control module 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-03 with home control module. 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-03 with home control module is «necessary», i.e. whether the purpose for using AbleCenter® AC-03 with home control module 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-03 with home control module 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® AC-03 with home control module 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-03 with home control module during school hours. The school is in such cases, entitled to continue using AbleCenter® AC-03 with home control module if one 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-03 with home control module, 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.

#### **What does the NDPA say?**

The Ministry of Knowledge has, together with NDPA released a short statement regarding the use of robot with camera in a letter to the Directorate of Education. [Click here to read the letter.](#)

«The Ministry has been in touch with NDPA about the issue. The text below is written in cooperation with NDPA.

The Norwegian Data Protection Authority points out that the Personal Data Act applies to the processing of personal data that takes place wholly or partly with electronic aids. Using a robot in the classroom as here, described as a "two-way transmission of sound and one-way transmission of image from the classroom", will, in the Data Protection Authority's opinion, be processing of personal data that takes place with electronic aids. The Norwegian Data Protection Authority believes that it can be assumed that individuals can be identified through this type of use of a robot in the classroom, and that the starting point is therefore that the Personal Data Act will apply."

The statement concerns the use of a robot with the possibility of two-way transmission of sound and one-way transmission of image from the classroom to a student who is staying elsewhere. This robot has the designation AV1 and will be referred to in the statement as either "robot" or "AV1".

#### **Contact us**

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