



# MORPHEAN

EYES WIDE OPEN ON

## Privacy Notice

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## 1. Who are the involved persons?

<b>User</b>	The User in the Morphean context is a person who will <b>have an account to sign in</b> to the platform. This account will have certain permissions and will contain personal information.
<b>Video Service Providers (VSP)</b>	The VSP sells the Morphean product to the User and installs it for the User. The VSP can <b>sign in to the platform as an administrator for the User</b> .
<b>Passive Person</b>	A Passive Person in the Morphean context is somebody who will <b>never sign in</b> to the platform. A Passive Person is somebody who will be linked to video analytics or business intelligence analytics because he will pass in front of the lens of a camera. This person is aware of a video surveillance system being present in the area and consents to it according to the local regulation.
<b>Active Person</b>	An Active Person in the Morphean context is a person who will <b>never sign in</b> to the platform but will detain an <b>account for smart access control</b> to have access to certain areas of a building at certain times.
<b>Morphean</b>	As the developer of the platform, Morphean can access the platform for maintenance, updates, help desk and monitoring purposes. Morphean <b>never signs in to a specific account but has only a global access to the platform as an administrator</b> .
<b>Platform</b>	Platform in the Morphean context means the digital place that makes accessible a variety of information to the Morphean product, such as the proactive video surveillance as a service, smart access control and business intelligence analysis.
<b>Personal Data</b>	In the context of this Notice, the reference to "Personal Data" includes several types of data (f.e. User's Data, video data, access data, information collected from your browser or tracking cookies), not including metadata.

## 2. Who is collecting the data?

You as User are collecting data when one of the video cameras you set up with your Video Service Provider (VSP) is recording or if you are having a smart access control. Your VSP has to make sure that you fulfil local regulations as to be allowed to record and use smart access control.

We as Morphean collect the data needed for you to access the platform, we are hosting your data including your video recordings on a cloud of a third party cloud service (see your profile for further details) and are processing the video data as to provide you with the needed information.

## 3. What data is being collected and processed?

### a) The Personal Data we collect and processed from you the User:

- First name
- Last name
- Email address
- Phone (Optional)
- Permissions

All actions of the User are tracked and recorded in an audit log.

Example:

- Camera XX visualized at 13.02
- Video exported on camera XX from 13.00 to 14.00

The log can be consulted at any time by you.

No processing of Personal Data is done on User's data. This Information is only used as static information for platform login and usage. No individual person is identified nor identifiable by a third party.

The User's data will not be used for marketing purposes. The User may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us at following address: **privacy@morphean.ch**

b) The Personal Data collected and processed from a Passive Person in video

You as User are collecting the video footage of the camera you setup with your VSP according to the setup you agreed to and the VSP implemented for you.

Passive Person in the video you record are not related to any identity on the platform nor are they identifiable by the platform.

c) The Personal Data collected and processed from a Passive Person in Business Intelligence

Miscellaneous statistics can be extracted to provide Business Intelligence data to you, but nothing is stored with direct relation to a Passive Person.

We potentially save:

- Amount of person entered
- Age range of the person
- Gender of the person
- Time spent in the shop / in areas of the shop
- Transaction done by person

All these data are totally anonymous and not related to any identified or identifiable individual person (metadata). These data are only general and aggregated statistics used for marketing and loss prevention purpose.

d) The Personal Data collected and processed from an Active Person

- First name
- Last name
- Credential information (not online identifier)
- Picture of the face (Optional)
- Video footage of access (Optional)

Every access of this person on any door is tracked with result (grant / refused). The time and potentially a video footage are saved in an access log. The access log is stored 12 months, while video footage is stored for a maximum of 30 days.

No post processing is done on these data. Morphean provides a search engine with table results to review access events.

The VSP and/or you the User has access to it, depending on the setup. You the User and your employee must agree to what is done by whom with the VSP.

e) Information collected from your browser or tracking cookies

We may also collect information that your browser sends whenever you visit our Platform or when you access the Platform by or through a mobile device. This data may include information such as your computer's Internet Protocol address (e.g. IP address), browser

type, browser version, the pages of our Platform that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Platform by or through a mobile device, this data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We use cookies and similar tracking technologies to track the activity on our Platform and hold certain information used to provide a better experience and never for marketing purposes.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Platform.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some elements of our Service.

Examples of Cookies we use:

- We use Session Cookies to operate our Service.
- We use Preference Cookies to remember your preferences and various settings.
- We use Security Cookies for security purposes.

#### 4. What is the legal basis for processing the data?

We collect and process data according to the EU General Data Protection Regulation (GDPR) and the applicable Swiss Data Protection Regulation.

You the User collect and process data according to the EU General Data Protection Regulation (GDPR) and applicable local laws and regulations with regard to Data Protection and Video Recording and Surveillance.

#### 5. What data will be shared with third parties?

We may employ third party companies and individuals to facilitate our Platform ("Third Party Provider"), to provide the service on our behalf, to perform service-related services or to assist us in analyzing and monitoring how our Platform is used.

These third parties have access to the Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. No third Parties are processing the Personal Data of you the User.

We may work together with **Google Analytics**. The User can opt-out of having made his activity on the Platform available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy/update>

#### 6. Where are my data hosted?

Your data are hosted with a third party cloud service. At this time we are working with Interoute. You can see the exact location of your data under your User profile. Interoute has no access to your data.

#### 7. What rights do you the User have?

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your User's Data directly within your account settings section. If you are unable to change your User's Data, please contact us at [privacy@morphean.ch](mailto:privacy@morphean.ch) to make the required changes.

You are entitled to exercise any time the following rights with Morphean:

- To access and receive a copy of the Personal Data
- To rectify any Personal Data that is inaccurate
- To request the deletion of Personal Data

You have the right to data portability for the information you provide us with. You can request to obtain a copy of your Personal Data in a commonly used electronic format.

Please note that we may ask you to verify your identity before responding to such requests.

You may request to receive your data including your video data for the purpose of transporting them to another data processor.

We include a tool to extract video data. This feature allows you to extract video per period of 4 hours. We do not (yet) provide dynamic anonymization feature to blur or mask people in video but only static mask for pre-defined area.

## 8. Deletion of Data

### a) User

When you the User are deleted, all tracked action stays in the system but without relation to an individual person. An ID replaces your info and this ID is not anymore related to you.

### b) Passive Person in Video

#### Automated deletion

A video is stored for a maximum of 30 days (depending on the chosen settings) and thereafter automatically deleted. As soon as the video is deleted, no further data exists about the Passive Person.

#### On Demand deletion

If the person requests to be deleted from the system, the VSP can delete the requested video period, unless this goes against the purpose of the system. As soon as the video is deleted, no further data exists about the Passive Person.

### c) Passive Person in Business Intelligence

As the Business Intelligence data (metadata) are aggregated and not related to physical or identifiable person, they are not deleted.

### d) Active Person

When the person is deleted, his history is kept and still accessible in the access log but not identifiable.

## 9. How long will the data be stored?

Your audit log is stored 6 months and the access log is stored 12 months. Your User profile is stored as long as you are using the Platform. The Business Intelligence data (metadata) is stored indefinitely as it is anonymous, not related to any identified or identifiable individual person.

**Please be aware that we do not backup your video data. Your video data is stored for a maximum of 30 days depending on the chosen settings.**

**10. What obligations do you the User have?**

You the User are responsible for your authentication details and the authorisation you give to your VSP. You should read and understand your contract with your VSP, the Term of Services, Privacy Policy and Privacy Notice as well as comply with your local law and regulations, in particular data protection, video surveillance and labour law regulation.

**You are responsible for your video footage and the backup of this footage.**

**11. If you have any questions about this Privacy Notice please contact us at [privacy@morphean.ch](mailto:privacy@morphean.ch).** You can also contact us under the following address and number:

Morphean SA, Rte du Château 112, 1763 Granges-Paccot

Website: [www.morphean.ch](http://www.morphean.ch)

Helpdesk: +41 26 422 00 98

**You will also find further information in the Privacy Policy.**