




sentiance

Privacy Management in de echte wereld

PRIVCON 2022
Koen Simoens



We turn
motion into
insights.

Inhoud

Wie is Sentiance?

Vanwaar komen wij: de ontdekking van privacy

Persoonsgegevens en onze rol als verwerker, locatie en anonimiteit

Wanneer het even misloopt

Het Data Charter

Internationale activiteiten en gevolgen

Interne organisatie en het Privsec team

Een blik op de toekomst

Q&A

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A woman with long dark hair, wearing a dark winter jacket with a thick, light-colored fur collar, is looking down at her smartphone. She is smiling slightly. The background is a blurred indoor public space, possibly a transit station or a mall, with other people and lights visible.

sentiance is the most complete provider of motion insights

We build a trusted, reliable and validated platform for processing mobile sensor data that allows clients to create impactful products and services around safety & prevention, sustainability and hyper-personalization.



5:39 pm - 5:52 pm

't Museumpleintje



5:37 pm - 5:39 pm

Walking trip



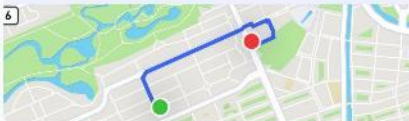
3:35 pm - 5:37 pm

Stedelijk Museum Amsterdam



3:31 pm - 3:35 pm

Walking trip



Your activity

Insights gets to know you better when you use it more.



Your work location

Antwerpen, België / Belgique /
Belgien

Your home location

Overijse, België / Belgique /
Belgien

Segments

Insights gets to know you based on your movements and habits.

Late Worker

Someone who works until late

Parttime Worker

Someone who works part-time

Social Activity : Limited

Profile based on user work/social activities score

Mobility Insights

4456.75 km 90h 23m



Your most used transport

You use your car on average 7 times per week.

• •

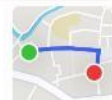
Recent trips

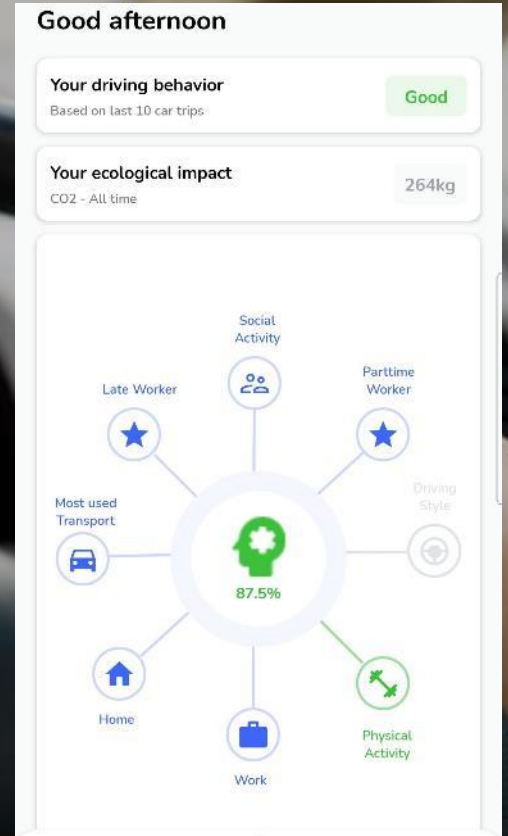
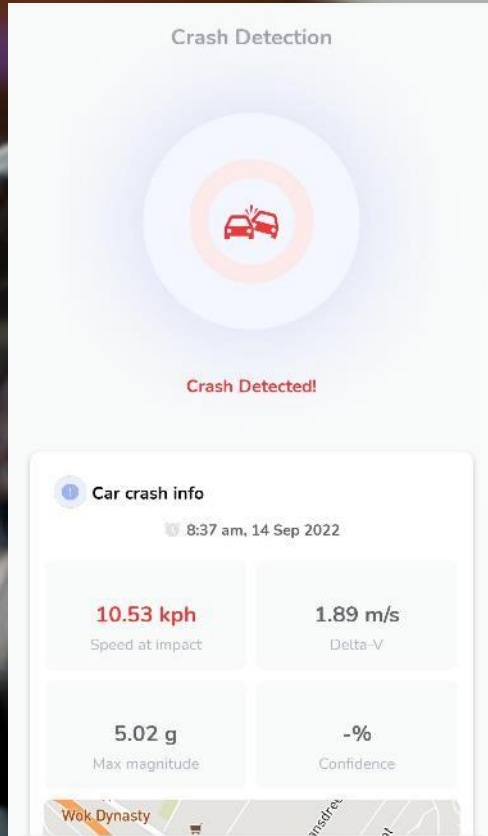
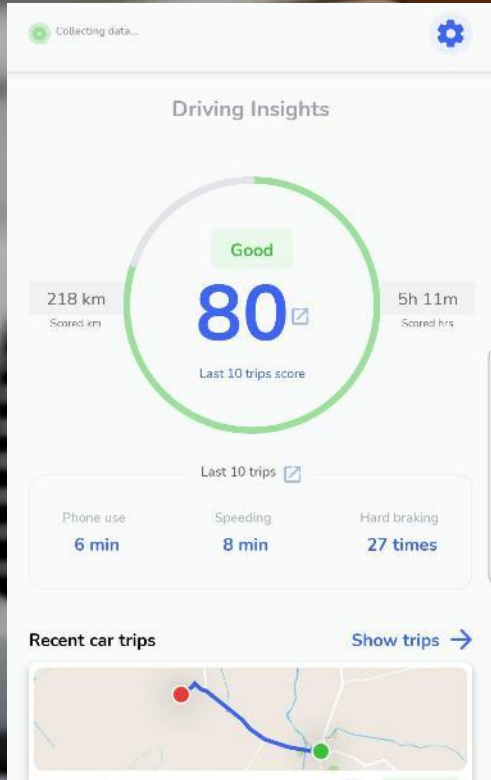
Show trips →

Single-mode trip

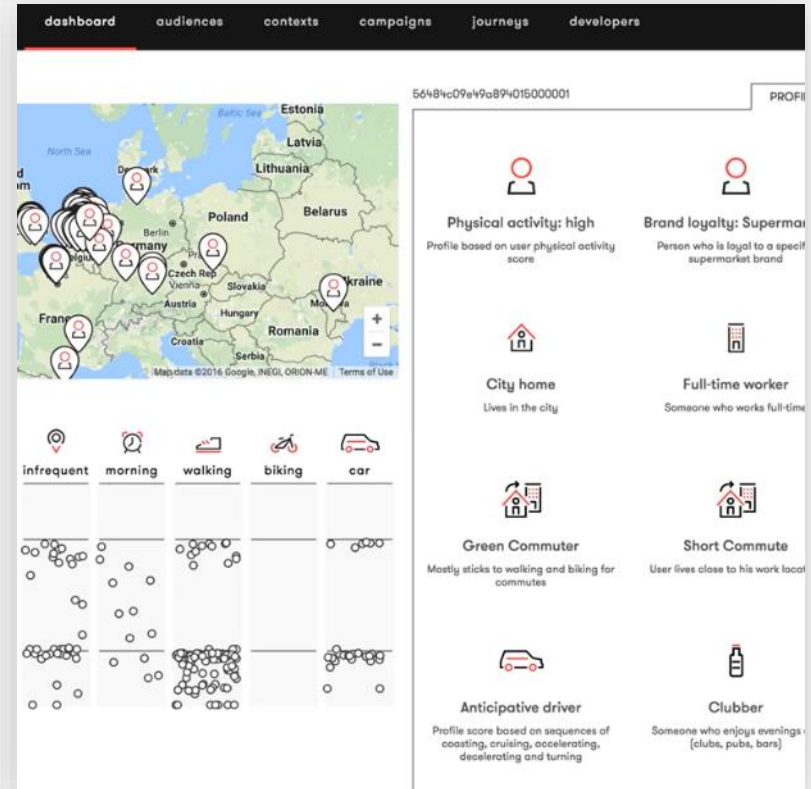


Car





De hele wereld moet onze coole technologie kunnen gebruiken! Euhm, privacy? Wat is dat?



**We hebben een DPO
nodig! De VP
Finance volgt een
DPO cursus.
Onafhankelijk?
Enter the DPO!**



Hoe het belang van persoonsgegevens uitleggen en onze rol als verwerker?

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Sentiance Confidential © 2018

Three guiding security principles to apply every day

Confidentiality



Integrity



Availability



If sentiance were a bank
personal data would be the money
clients deposit with us

**Typische discussie: wij
verwerken geen PII.
Locatiegegevens, zijn
dat persoonsgegevens?
Pseudoniem?
Anonymien?**



Wanneer de zaken niet lopen als gepland...

Zoals die ene keer dat we per ongeluk

Wanneer de zaken niet lopen als gepland...

Inclusief testgegevens van medewerkers.
Zijn dat ook persoonsgegevens?

Wanneer de zaken niet lopen als gepland...

En die keer dat het even duurde...
Bug bounty to the rescue!

Wanneer je de verschillen tussen artikel 33 en 34 begint te appreciëren...

Artikel 33

Melding van een inbreuk in verband met persoonsgegevens aan de toezichthoudende autoriteit

1. Indien een inbreuk in verband met persoonsgegevens heeft plaatsgevonden, meldt de verwerkingsverantwoordelijke deze zonder onredelijke vertraging en, indien mogelijk, uiterlijk 72 uur nadat hij er kennis van heeft genomen, aan de overeenkomstig artikel 55 bevoegde toezichthoudende autoriteit, **tenzij het niet waarschijnlijk is** dat de inbreuk in verband met persoonsgegevens **een risico inhoudt** voor de rechten en vrijheden van natuurlijke personen. Indien de melding aan de toezichthoudende autoriteit niet binnen 72 uur plaatsvindt, gaat zij vergezeld van een motivering voor de vertraging.

Artikel 34

Mededeling van een inbreuk in verband met persoonsgegevens aan de betrokkene

1. **Wanneer** de inbreuk in verband met persoonsgegevens **waarschijnlijk een hoog risico** inhoudt voor de rechten en vrijheden van natuurlijke personen, deelt de verwerkingsverantwoordelijke de betrokkene de inbreuk in verband met persoonsgegevens onverwijld mee.

Iemand wil onze data kopen. Verplichtingen als verantwoordelijke en data charter.

The Sentiance Data Charter

“Above all, it is our mission to use data to make people’s lives safer, healthier and more convenient.”

Integrity

- We focus on providing insights to our clients that create tangible value for the end user
- We only use specific sensor data directly obtained from our clients received with unambiguous consent from the end user
- We only process data in a lawful way which is adequate, relevant and limited to the purpose agreed to by the end user
- We strongly advocate transparency towards the end user with regard to what data is ingested and how it is being used, even though it is the ultimate responsibility of our clients
- We propagate fairness and accuracy on the insights derived from the processed data
- We do not broker, sell or buy the data received from or processed for clients
- We are aware of the importance of good data governance and understand that misuse can severely harm the end user, our clients, our colleagues and our company.
- We only engage in projects that are in line with this data charter and immediately terminate engagements that would infringe upon any of the points set forth herein

Security

- We implement the highest standards with regard to data security and data protection
- We continuously review applicable safeguards to optimizing the existing platform and integrate a privacy by design and by default approach towards creating new components
- We limit data access and only enable team members on a need-to-know basis
- We uphold strict rules to the use of data by imposing and enforcing internal policies
- We enforce our clients to comply with applicable regulatory framework

Het mobile phone ecosystem en de rol van app stores. Gelijke spelregels?



Internationale ambities en gevolgen



Sentiance offices

Antwerp, London, Singapore, Dubai,
Istanbul, Tokyo, Toronto, Vilnius

Industries

Mobility, Insurance, Banking...

Internationale ambities en gevolgen

Example 3: Processor in the EU sends data back to its controller in a third country

XYZ Inc., a controller without an EU establishment, sends personal data of its employees/customers, all of them non-EU residents, to the processor ABC Ltd. for processing in the EU, on behalf of XYZ. ABC re-transmits the data to XYZ. The processing performed by ABC, the processor, is covered by the GDPR for processor specific obligations pursuant to Article 3(1), since ABC is established in the EU. Since XYZ is a controller in a third country, the disclosure of data from ABC to XYZ is regarded as a transfer of personal data and therefore Chapter V applies.



Een privacy-friendly tool die inbox scant en je rechten helpt uit te oefenen... Jaarlijkse DSR test



Personal data erasure request from [REDACTED]

Hello Sentiance,

My name is [REDACTED] and I hereby request Sentiance (sentiance.com) to erase all personal data that you hold about me.

I have used the [Mine service](#) to send this request, but please respond directly to my personal email address: [REDACTED].

Please send me a written confirmation of complete and permanent erasure of the personal data that you hold about me to my email address, after you have completed the erasure process.

Praktische organisatie: het PrivSec team en zijn activiteiten

BC ISO 27701:2019
Certified by
Brand Compliance

BC ISO 27001:2017
Certified by
Brand Compliance



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Red Team Contest SonarQube Audit GDPR Survey PrivSec Training

THE USUAL SUSPECTS **PRIVSEC TEAM**

VINCE
01/07/2014

THE DPO
08/01/2016

THE DON
08/02/2017

NOW May Awareness Month 3

I want to hack
Sentiance
Name:

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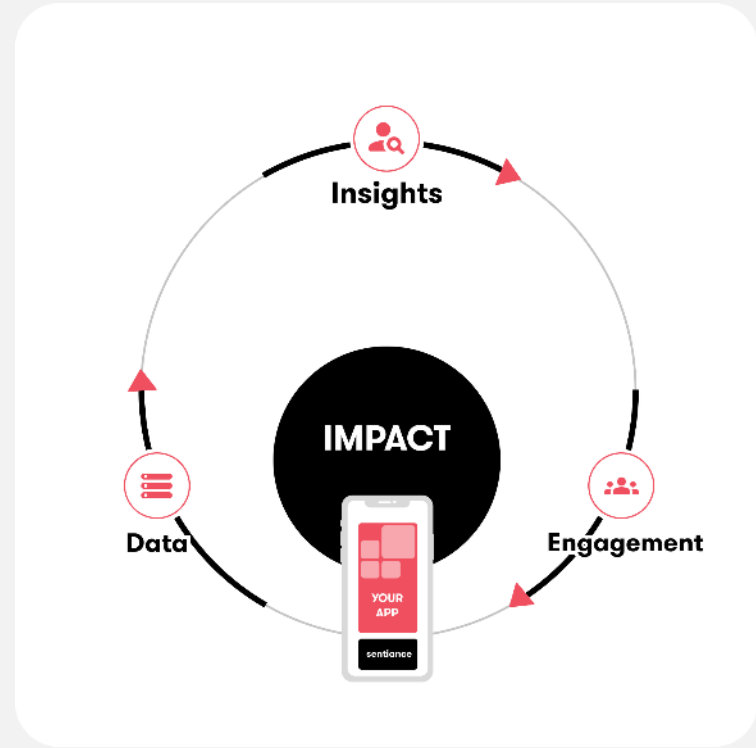
I want to hack
Sentiance
Name:

The sentance on-device platform

Transforms apps into real-life customer engagement platforms

Probleem opgelost: what happens on the device, stays on the device!
Verwerken we nu nog persoonsgegevens?

sentance



Edge computing: raw data never leaves the user's phone. Data is processed and used on the device.

An aerial night view of a complex highway interchange with multiple overpasses and ramps. The scene is illuminated by streetlights and the headlights of cars, creating a dynamic pattern of light trails. In the center of the image, there is a white circular graphic with four red dots at its cardinal points. Inside this circle, the text "We turn motion into insights." is displayed. The word "motion" is in red, and "insights." is in white. The background is a dark, high-angle shot of the highway system.

We turn
motion into
insights.

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www.sentiance.com