Impact assessment — camera-based customer counting

LINDBERGH FORMATION — 16 rue de Maillé, 91310 Montlhéry, France · Companies register (RCS) Evry 817 946 114

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Vireval · 34 stores · fictional document

Fictional document — demonstration example

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Fictional document, produced for the demonstration. It follows the content expected by **Article 35 of the GDPR**: systematic description, necessity and proportionality, risks, measures. The nine assessment criteria are those published by the CNIL (cnil.fr, « ce qu'il faut savoir sur l'analyse d'impact relative à la protection des données »).

Why an impact assessment is due

CNIL criterion	Met?	Why
Evaluation or scoring	No	No score attributed to a person
Automated decision with legal effect	No	No individual decision
Systematic monitoring	**Yes**	Continuous capture during opening hours, in 34 places open to the public
Sensitive data	No	No Article 9 GDPR data collected

CNIL criterion	Met?	Why
Large-scale collection	**Yes**	34 stores, around 210,000 visitors a month
Matching of datasets	No	No linking with the loyalty CRM
Vulnerable people	No	General public
Innovative use	**Yes**	In-store image analysis, unexpected by the public
Exclusion from a right or a contract	No	Not applicable

> **Three of the nine criteria are met.** The CNIL holds that an impact assessment is required in particular where **at least two** are. The file is therefore due before any go-live.

Necessity and proportionality — the three options compared

Option	What it measures	Personal data	Impact assessment due?
Image-free passage sensors	Crossings by time slot	**None**	**No**
Till receipts mapped to the hour	Purchases, not visitors (2.3 visitors per receipt measured)	Already processed	No — operation already recorded
Camera counting	Visitors by time slot, finest precision	Image processed then erased	**Yes**

What the supplier's documents say

Point checked	What is written	Document

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Retention of the image	**1.4 seconds in memory**, nothing written to disk	Technical notice v4.2, p. 11
Silhouette template	Computed then erased after counting	Technical notice v4.2, p. 12
« Store journey » mode	**Re-identifies a silhouette from one camera to the next — disabled by default**	Technical notice v4.2, p. 19
Hosting	France, processing in the EU targeted	Terms of service, art. 7

The seven measures proposed

Measure	Risk addressed	Effect
Amendment clause: « journey » mode enabled on written instruction only, disabling logged	Drift from counting to following	**Decisive — without it, the assessment must be redone**
Signage at every entrance and full information online	People not informed	High
Contractual ban on any linking with the loyalty CRM	Matching of datasets	High
Logging of access to camera configuration	Untraced change of settings	Medium
Annual review of the purpose and of measured usefulness	Processing that outlives its need	Medium
Field of view limited to circulation areas	Capture beyond the need	Medium
DPO contact point displayed in store	Difficulty exercising rights	Medium

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Residual risk: moderate, provided the « journey » mode stays disabled. If it is enabled, two measures become insufficient and the file must be redone before any go-live.

Proposed amendment clause, ready to take to signature

« The supplier warrants that the function known as « store journey », allowing the re-identification of the same person across several cameras, shall remain disabled. It may be enabled only upon written instruction of the controller, for an expressly designated purpose and duration. Every enabling and disabling shall be logged, the log being kept available to the controller. »

Conclusion — reserved to the controller, on the DPO's advice

Opinion of the data protection officer: _____

Decision of the controller, on _____: _____

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https://bluelemonagent.ai/en/entreprises/cas-usage/agent-ia-dpo-rgpd

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