



Distance learning system with home control

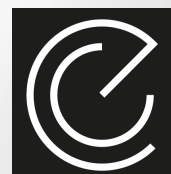


## **AbleStudio™ Access**

Distance learning system



## Privacy policy



Data controller is Eyecast AS (Norway)



**We do not collect contact information from the user of AbleStudio™ Access. We only collect data necessary for correct invoicing and customer support.**

AbleStudio™ Access 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 private persons, companies, organisations, schools, or municipalities purchase AbleStudio™ Access.

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

When AbleStudio™ Access is in use a direct video feed is transmitted from the classroom between the AbleStudio™ Access device to a dedicated AbleStudio™ Access 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 AbleStudio™ Access/software gains access to what happens in the classroom. At the outset the video feed can not be saved, neither by Eyecast AS, the user or others. But if required, this feature can be activated.

We gather only contact information about our customers.

aid centre, school, organisation or municipality. We usually do not know who the user of AbleStudio™ Access is, but only who the AbleStudio™ Access device was purchased by. If Eyecast 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 Eyecast 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 AbleStudio™ Access'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 [mail@eyecast.no](mailto:mail@eyecast.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 AbleStudio™ Access 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 Eyecast 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. Eyecast AS will notify the registered persons by requests for information, unless specifically stated in the legal procedures that notification is illegal.

### Visible Indicators.

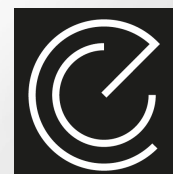
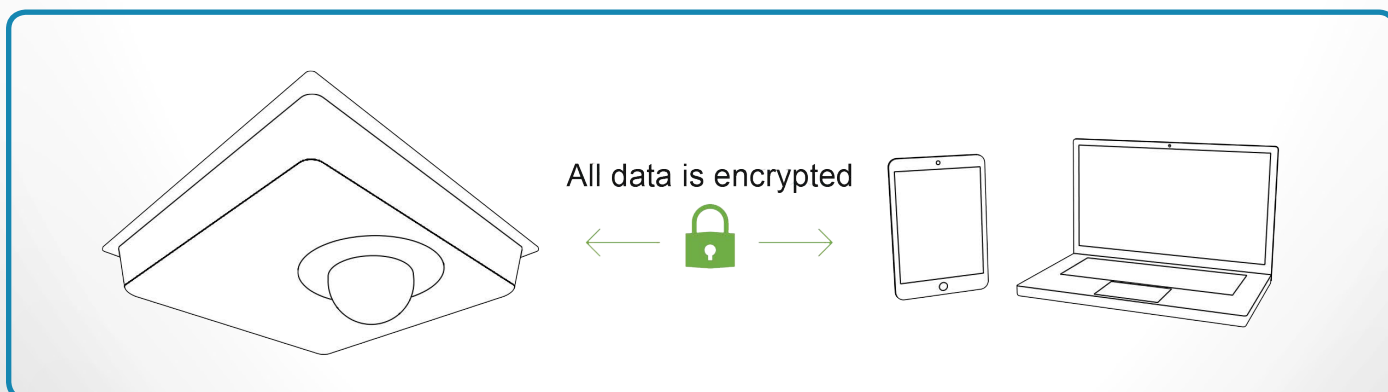
The AbleStudio device features a red light when active and a green light when a user is connected, ensuring transparency about system status.

### User Control.

Users can turn off AbleStudio™ Access through the software, preventing unauthorized access and ensuring system security.

### End-to-End Encryption.

The video stream between AbleStudio software and AbleStudio™ Access is end-to-end encrypted, safeguarding against external access.



### **Fixed Positions.**

The system allows the storage of up to 9 fixed camera positions, zoom level and angles, providing security against unauthorized access outside designated areas. By tapping on the number-key where the position and zoom level are stored, the camera quickly moves to the saved position with the saved zoom level. This happens so quickly that it is virtually impossible to decipher the image along the way from one position to another. By using fixed positions, one cannot therefore obtain information other than that contained within the stored position.

### **Locked Positions.**

AbleStudio™ Access can be locked to fixed positions/camera angles that are saved and approved by the instructor/administrator in advance. This makes it impossible to obtain image cutouts outside the designated areas.

### **Wired Communication.**

The option for wired communication through the power grid enhances security and prevents unauthorized access.

### **Single Device Connection.**

AbleStudio™ Access can be configured to connect to only one device at a time via a fixed IP address, preventing multiple unauthorized connections.

### **Instructor/Administrator Control.**

With the AbleStudio software/app, the instructor/administrator has granular control over permissions granted to remote users, managing video and audio streams and system control capabilities.

### **Password protection.**

Before you are able to use software / app for AbleStudio™ Access, you must activate the software with a code provided by Eyecast AS.

### **Password protected wireless network login.**

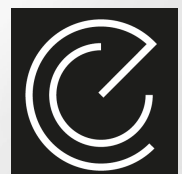
To control the system through the wireless network, one must log in to an encrypted end-to-end network with the SSID and password.

### **Nothing stored.**

AbleStudio™ Access is used in real time. The possibility of recording video stream is disabled by default, but can be enabled if desired. AbleStudio™ Access can be compared to binoculars that provide the opportunity for all homemakers (universally adapted) to see the necessary positions in the classroom to participate in teaching and to some extent experience social life in class with pictures and sound. The "Take photo" function is active by default. But can be disabled from the instructor/administrator.

### **Server selection and security.**

AbleStudio™ Access software and hardware are tailored to commonly used and accepted systems in schools, leveraging existing platforms' server capacity and security levels (Teams and Zoom). We have developed the software so it coexists and complements in a good way with these platforms. We see that many of these platforms deliver high quality when it comes to server, capacity and security.



**We strongly recommend that our equipment is to be used in accordance with local laws and regulations concerning privacy and security.**

#### **NORWEGIAN PRIVACY REGULATIONS.**

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).**

Eyecast 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 AbleStudio™ Access 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-ngen--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»

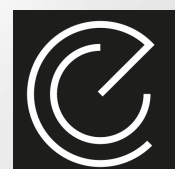
AbleStudio™ Access are systems that maximise and simplify those features mentioned in the statement, in addition to other functionality. We therefore experience this statement as relevant for our remote education systems and will in the following underline some cuttings from this statement. These cuttings 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.

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.eyecast.no/privacy](http://www.eyecast.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 AbleStudio™ Access, 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 [mail@eyecast.no](mailto:mail@eyecast.no) if you want to receive complete evaluation document.

### Consent.

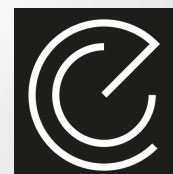
Consent from all pupils, teachers and others that may come into contact with the AbleStudio™ Access-device during use, is a possible way for schools to ensure a valid data processing basis. Consent is though but one of several alternative data processing bases in the Personal Information Act. Since AbleStudio™ Access 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 Eyecast's evaluation that AbleStudio™ Access is designed in a privacy friendly way which at the same time fulfills an important purpose, namely to ensure that pupils in homebound situation can take part in education on equal terms with their classmates.*

The use of AbleStudio™ Access, 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 Eyecast AS that a clear «justified interest» exists for schools to start using AbleStudio™ Access, they. 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 AbleStudio™ Access, they is «necessary», i.e. whether the purpose for using AbleStudio™ Access, they 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 AbleStudio™ Access, 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 AbleStudio™ Access, 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 AbleStudio™ Access, during school hours. The school is in such cases, entitled to continue using AbleStudio™ Access 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 AbleStudio™ Access, Eyecast AS does not store any personal data on behalf of their users/customers. Eyecast only processes the following data to ensure good customer support and correct invoicing:

- Name of purchaser, order number and reference number.

Eyecast 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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