

Privacy Impact Assessment Report

Activity Overview and Privacy Risk Rating

Activity Name	Safety & Innovation Zone
Report Published (Last Revised)	July 14, 2021 (Last Revised Sept 30, 2021)
Project Purpose and Scope Summary	The purpose of the activity is to pilot sensor technology in a public, commercial location through a public-private partnership. The pilot project will inform public safety agencies about pedestrian movements and environmental factors that may influence the nature of their response and help to improve first responder response times. See the project webpage for more information, including the presentation to the County Board .
Project Sponsors/Stakeholders	Arlington County Fire Department, Public Safety Communications and Emergency Management and Technology Services US-IGNITE Comcast VA Commonwealth Cyber Initiative Juganu
Privacy Risk Rating	Low
Data Privacy Point of Contact	Jaime Lees, Arlington County Chief Data Officer 703-228-0752 jlees@arlingtonva.us
Information Collected/Used About Individuals	The sensor senses a street scene in three ways: optical, audio and environmental inputs. The sensor processor translates the scene inputs into anonymous data such as people counts, environmental conditions and noise levels.
About whom is the information collected?	Residents, Businesses, Visitors and vehicles (including scooters and bicycles), and objects will be counted, but not identified. Signage designating the area where the sensors are operating will be posted.

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How Does the Activity Meet the Project's Privacy Principles?

Principle	Approach
<p>Minimum Necessary – Personal information shall be required and retained only as necessary to deliver and improve government services and as allowed by law.</p>	<p>Information collected via sensors is not personally identifying. Data collection is restricted to aggregate, anonymous measures such as people counts and environmental conditions. Access to the sensor technology is secured.</p> <p>During the initial sensor calibration stage, the sensor will translate what it senses into anonymous line/sketch drawings. These images contain no identifying characteristics and will be disposed of by the end of the pilot.</p>
<p>Quality – Accuracy of personal information shall be purposely planned, routinely validated and timely corrected where feasible.</p>	<p>Data collection is restricted to aggregate, anonymous measures such as people counts and environmental conditions. Validation of the aggregate data is conducted via comparison with generated line/sketch drawings.</p>
<p>Transparency – Intended uses and/or disclosure of personal information shall be defined and communicated before collection.</p>	<p>The project purpose and low privacy risks are actively being communicated to relevant County Commissions (ITAC, EPAC), civic associations and community groups.</p> <p>A Data Privacy Oversight Panel for this activity has been established to provide expert community and independent feedback on all privacy-related aspects of the project. Meetings are held monthly and are open to the public (visit the project webpage for information on upcoming meetings).</p> <p>Project data will be published to the County's Open Data Portal.</p>
<p>Stewardship – Personal information will be secured and protected throughout its lifecycle. Practices shall be routinely reviewed and updated in keeping with emerging and evolving threats to privacy and security.</p>	<p>County staff manage security of the sensor technology. The project team, with support from the external Data Privacy Oversight Panel, will monitor the information collection and provide input on privacy protection practices throughout the pilot. Newly identified privacy and/or security risks and updated risk mitigation will be incorporated whenever identified.</p>

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What are the Potential Privacy Risks and How are They Being Managed?

Risk Area	Response
Anonymous line/sketch drawings and/or published open data might be combined with other public information and allow for individual identification	Generate as few sketches as necessary and securely delete as soon as practical. Secure network against physical and remote data breach. Perform internal and independent data review and follow open data publication practices.
Validation and/or use of sensor data might result in unforeseen privacy risk activity	Perform privacy risk assessment on all validation and use case application processes. Ensure any new data sources and processing methods are reviewed for personal information prior to using or sharing and perform personal risk assessment if personal information identified.
	Execute privacy-informed project cybersecurity plan.
Project partners might violate permitted collection and/or use of sensor data	Execute written data sharing agreements with partners. Monitor and verify partner activity and access.
Public may have negative perception of project value versus risk	Execute privacy-informed communications plan and lessons learned activity.