



Short Public Report

1. Name and version of the IT-based Service:

Retail Movves (as implemented by Sonae Sierra)

2. Provider of the IT-based Service:

Company Name:

Sierra Portugal, S.A.

Address:

Torre ocidente, Rua Galileu Galilei, 2, 3º Piso

1500 – 392 Lisboa

Contact Person:

Rafael Pelote

3. Time frame of evaluation:

November 2013- February 2015

4. EuroPriSe Experts who evaluated the IT-based service:

Name of the Legal Expert:

Inês Antas de Barros

Address of the Legal Expert:

Av. Duarte Pacheco, 26 | 1070 - 110 Lisboa – Portugal

Name of the Technical Expert:

Judith Larreta

Address of the Legal Expert:

Plaza Azkoitia, 5, 2-D, 20011 Donostia San Sebastian – Spain

5. Certification Body:

Name: EuroPriSe Certification Authority

Address: Joseph-Schumpeter-Allee 25

53227 Bonn

Germany

eMail: contact@european-privacy-seal.eu

6. Specification of Target of Evaluation (ToE):

Retail Movves (as implemented by Sonae Sierra)

The information used in the management of the system changes very frequently and is discarded before being used in the preparation of process reports.

The components that are part of ToE are:

1) Retail Movves (as implemented by Sonae Sierra) Software (this is a location tagless technology that passively collects IMSI and Mac Address from mobile devices using antennas and local servers installed specifically for this purpose, and calculates, with a high degree of trust, the location of a device.

All de-identified and encrypted information which may be visualised through the software is centrally aggregated so as to generate statistic reports. All such statistic reports are sent to Sonae Sierra, providing valuable business information).

2) Configuration mechanisms and tools that allow the encryption of the information.

3) Configuration and mechanisms: irreversibility of encryption; immediate discharge of the information initially collected (IMSI and MAC Address); access by Sierra Portugal, S.A. limited to encrypted, de-identified information.

The ToE specifically excludes analysis of the terms of operation of mobile devices by visitors or any other technological, legal or operational matter not expressly identified here above.

7. General description of the IT Service:

The IT-based service Retail Movves (as implemented by Sonae Sierra) is a visitor flow analytic solution for indoor environments (presently, shopping centres). Its objective is to provide statistic information which will help shopping center managers in taking the best operational decisions regarding the management of the shopping centre. The seal at stake is not awarded to the software used as basis for the service, but to its operational impact and consequences on decision-making by the management of the shopping centres, both in terms of strategy, business management and operation of each specific shopping centre.

Retail Movves (as implemented by Sonae Sierra) is a location tagless technology that, through the installation of antennas that passively collect MAC IDs and IMSIs from visitors' mobile devices, collects IMSI and Mac Address from mobile devices using passive antennas and calculates the location of a device within a given geographical range.

The information is de-identified and irreversibly encrypted and then sent in an aggregated manner to a central reporting server, where it is processed to generate statistically relevant reports, providing valuable business information.

Nodes only receive broadcasted data from users' devices; they do not broadcast any frame or packet. They are full passive listening nodes. The nodes automatically encrypt and discard the collected data. They hash the information using the SHA-2 (256 block size) cryptographic function, plus an internal salt. The salt is created daily with at least 12 full random chars (0-255 combinations each). This function is an only one direction function, and once it is implemented the system obtains dissociated data, and it is not able to undo the process. This function cannot be reversed and the reversal risk no longer exists.

The original information is automatically discarded a few milliseconds after it has been detected. It is managed like temporal variables, not stored at any kind of file or database. The whole de-identifying process is automatically done in few milliseconds at the node, so no original information can be accessed at any point of the process.

Finally, the local server, in a daily basis, when the commercial centre is closed, processes and aggregates the de-identified data received from the nodes. Then it sends the resultant information (using a dedicated 3G connection protected by SSL) in an aggregated manner to the central reporting server and automatically deletes it. The reporting

server shows de-identified information in graphics, statistics and heat maps.

8. Transnational issues:

Retail Movves (as implemented by Sonae Sierra) will be available in Europe. Servers will be located in the EEA, so there are not any transnational data flows to third countries.

9. Tools used by the provider of the IT-based service:

Hardware

Retail Movves (as implemented by Sonae Sierra) custom-built Nodes, with an ARM processor (system-on-chip architecture) and dedicated Wi-Fi, Bluetooth and Universal Software Radio antennas (passive elements). Dedicated network (basically ethernet cables and occasionally WPA2 protected dedicated wi-fi). All the infrastructure is separated of any other network.

Software

Product: Retail Movves (as implemented by Sonae Sierra)

O.S. Minimal Debian Linux (6.0)

10. Edition of EuroPriSe Criteria used for the evaluation:

Version November 2011

11. Evaluation results:

Retail Movves (as implemented by Sonae Sierra) has passed the legal evaluation of the possible data privacy issues related to the implementation of the product by Sonae Sierra, considering that (i) no personal data will be processed (due to the automatic, immediate and irreversible encryption and discharge of the information); (ii) no one is able to access information that may identify an individual (i.e. the encryption is secure); (iii) not only are different levels of access provided, but security measures are also put in place to prevent unauthorized and/or unnecessary access to the information included in the IT tool.

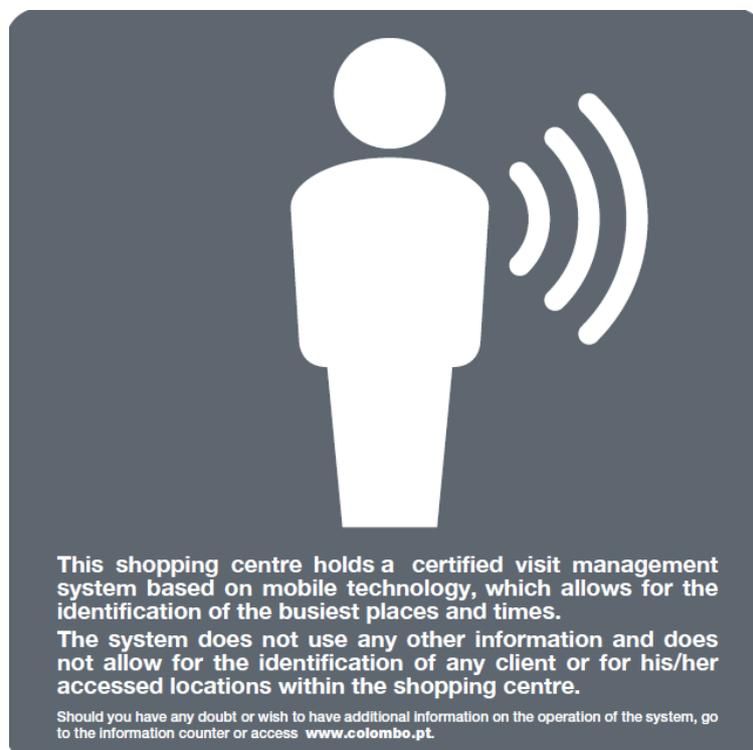
The measures implemented have led us to conclude that no personal data is processed in the scope of the service. Indeed, while it could be, in theory, possible to argue that personal data could be processed in the scope of this service (considering the initial milliseconds in which information is collected), the technical, logistic and organisational security measures involved in the operation means that it is impossible for any person to access any information, prior to it being completely and irreversibly de-identified, which means any information processed is not liable to be traced back to a single person/mobile device owner/shopping centre visitor).

Despite the fact that no personal data is processed (and therefore, no obligation to provide information under Article 10 of Directive 95/46/EC applies), Sonae Sierra provides clear information to the shopping centre visitors, regarding the implementation of Retail Movves (as implemented by Sonae Sierra) (and the terms in which the visitors may, if they so desire, prevent this service from taking place), assuring complete transparency.

This includes information on the terms in which the shopping centres may use visitor information in this scope. Information regarding Retail Movves (as implemented by Sonae Sierra) will be made available through notices placed in the entrance of the building and staff at the shopping centre's information point will be informed as to the terms of operation of the service, the impact (or lack thereof) in the users' privacy). This will include

information on both the legal and technical aspects of Retail Movves (as implemented by Sonae Sierra).

In addition to information placed at the entrance of the shopping centre and possible access to information in the shopping centre information point and to information in this respect included in the shopping centre's website and flyers will be immediately provided to visitors in the information point, whenever requested. The logo and pictogram used in the website and in the flyers and information included in visible locations will be:



The visitor is also informed of the terms in which he/she may prevent this service from being applicable, namely by turning off their mobile device, which will prevent the collection of IMSI and MAC ID.

From a technical standpoint, Retail Movves (as implemented by Sonae Sierra) provides visitor flow information in a statistical way with absolute respect and no interference in people's privacy. In order to respect privacy, Retail Movves (as implemented by Sonae Sierra) is based on one idea: persons cannot be identified or identifiable at any moment of the usage of

Retail Movves (as implemented by Sonae Sierra), on any place and stage of its information chain. The key issues to reach definitive de-identification of the visitors of the indoor environments (shopping centers) are these:

- Immediate and automatic encryption and discarding of the original information (IMSI, Mac Address) gathered from the device (prior to any possible human intervention). Collected information is immediately encrypted and erased at the node;
- Application of a strong irreversible encryption system;
- Not storing of the original information;
- No possible recoverability of the original information;
- The whole Retail Movves (as implemented by Sonae Sierra) function is based on the execution of a unique monolithic executable program which gathers, encrypts and discards (the original information) as one, so if something does not work properly the whole execution stops and devices are not detected;
- Nodes hardware, software & location design (to avoid any security problem);
- Dedicated infrastructure;
- Authentication system using electronic certificates.

Retail Movves (as implemented by Sonae Sierra) shows that a complex objective like providing reliable visitors flow information can be reached using innovative technology while simultaneously ensuring de-identification and data security compliance.

12. Data flow:

16. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	Excellent	<ul style="list-style-type: none"> • Retail Movves (as implemented by Sonae Sierra) is designed and intended to be implemented in accordance with the aim of collecting, processing and using no personal data at all. • The processing of the information is carried out without the use of identifiable data, since both the MAC Address and the IMSI are automatically de-identified and encrypted. • The de-identification and encryption is irreversible.
Transparency	Excellent	Despite no processing of personal data being carried out in the context of the implementation of Retail Movves (as implemented by Sonae Sierra) by Sonae Sierra, clear and comprehensive information regarding Retail Movves (as implemented by Sonae Sierra) is provided to the customers.

<p>Technical-Organisational Measures</p>	<p>Excellent</p>	<p>Retail Movves (as implemented by Sonae Sierra) successfully complies with the technical and organisational measures. It is remarkable the automatic and immediate encryption and discarding of the original information (which is not stored). The encryption system, based on a strong hash function and a changing salt, has been built to definitively break the link between the original collected (and discarded) information and the resultant output. Additionally, the custom built nodes and the whole dedicated infrastructure contribute to ensure the security of the system.</p>
<p>Data Subjects' Rights</p>	<p>N.A.</p>	<p>In this case, since there is no processing of personal data in the context of Retail Movves (as implemented by Sonae Sierra), Article 10 of Directive 95/46/EC is not applicable.</p> <p>Despite this fact, Sonae Sierra provides clear information to the shopping centre visitors, regarding the implementation of Retail Movves (as implemented by Sonae Sierra), assuring complete transparency.</p>

Experts' Statement

We affirm that the above-named IT-based service has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Place, Date Legal Expert	Name of Legal Expert	Signature of
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Place, Date Technical Expert	Name of Technical Expert	Signature of
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Certification Result

The above-named IT product passed the EuroPriSe evaluation.

It is certified that the above-named IT product facilitates the use of that product or service in a way compliant with European regulations on privacy and data protection.

Place, Date	Name of Certification Authority	Signature
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