Privacy Challenges in a Mobile Environment

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Agenda

1. Privacy Challenges
   A. The usual suspects
   B. Multinationals
   C. Mobile industry

2. Location based services privacy challenges
   A. What are the challenges?
   B. Challenge per type

3. An example of Privacy by Design
Mobile is different
"Usual Suspects of Privacy"

Security and technical and organisational measures

Third party management and outsourcing

Notifications and user choice
Additional challenges as a multinational

Authority Requests

Educating your staff world wide

Laws are different ➔
Localisation and updates drive costs
Additional challenges for mobile industry

Screen size limited

Multitude of parties - Who is the controller?

Multitude of sensors – new rules needed?
Who is the controller?

NEW REGULATION PROPOSAL

Article 24

Joint controllers

Where a controller determines the purposes, conditions and means of the processing of personal data jointly with others, the joint controllers shall determine their respective responsibilities for compliance with the obligations under this Regulation, in particular as regards the procedures and mechanisms for exercising the rights of the data subject, by means of an arrangement between them.
Addressing location-based services privacy challenges
LBS Privacy Challenges

Street View Imagery

Positioning = Identification?

Contextual Services
Faces
It is possible to position without identifying
Example use case
Employee location service

Indoor positioning system in Nokia office campus areas
- For locating assets e.g. meeting rooms and see real-time booking status of meeting room
- To locate employee permanent seats

By signing up to service employee can
- see his/her own location on the map
- see location of selected/consented colleagues on the map
Privacy by Design

- Informing the employees
  - Employee consent is required when signing up to service
  - Works councils
  - Privacy Supplements
- Granular choices
  - Whom to share with
  - How accurately
- Geofencing: User location is visible to the others only while in Nokia campus area
- Log data: No user specific location logs are stored in system
- In private areas like health center or restroom the system is arbitrating the location and not sharing the exact location with the others
Thank you