ePrivacyseal

CERTIFICATE

no. 439/23

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 3 May 2023

BlueZoo, Inc.
325 Sharon Park Drive, Suite 940, Menlo Park, CA 94025, USA
as a processor in the sense of art. 4(8) GDPR

operates its product or service
„BlueZoo Count, Analyze, Convert, Flow & Party Squasher“
version 19 April 2023
as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate.

final audit day: 02/05/2023
next planned monitoring by 21/01/2025
period of validity: 01/06/2023 – 21/01/2025

The certification decision takes place under the validity condition described in Annex 3
and in conformity with the criteria catalogue for the “ePrivacyseal EU” (version 3.0 of May 2022)
of ePrivacyseal GmbH.

*ePrivacyseal GmbH is not an accredited certification body within the meaning of art. 42(5) GDPR.

Annex 1 to certificate no. 439/23

Definition of processing activities

BlueZoo Sensors

BlueZoo sensors listen passively for probes from mobile devices that contain media access control (MAC) addresses. When a mobile device uses or searches for Wi-Fi access points, it broadcasts a MAC address (it "probes") to identify itself to the access point. BlueZoo sensors listen for these probes, consisting of MAC addresses and probe metadata (e.g. signal power level), but no additional information. To maintain transparency of means and purpose of BlueZoo data processing, BlueZoo recommends that its customers display a clear and prominent notice at locations where BlueZoo sensors are in use. BlueZoo provides its customers with sample language describing data collection suitable for such a notice. This notice lets people know that their mobile device's MAC address is being collected via Wi-Fi signals and explains how mobile device users can control the processing of MAC address data.

The BlueZoo Cloud

Only after pseudonymizing a mobile phone's MAC address does a BlueZoo sensor transfer information to the BlueZoo cloud. BlueZoo stores its pseudonymized sensor data on the BlueZoo cloud, which is implemented using Amazon Web Services (AWS). Data in the BlueZoo cloud are stored in a multi-tenant environment. Of course, BlueZoo data are not accessible to other AWS customers. AWS deploys a number of physical and IT barriers to keep customer data safe.

BlueZoo Opt-out Infrastructure

When the BlueZoo cloud received pseudonymized MAC addresses from BlueZoo sensors, it first determines which (if any) of the pseudonymized MAC addresses have opted not to participate in BlueZoo's analytics processing. Each cluster maintains a copy of the list of opt-out MAC addresses, and each incoming MAC address is compared to this list which is stored in pseudonymized form. Today, consumers register MAC address on the BlueZoo.io web site if do not want to participate in the collection of BlueZoo analytics.

BlueZoo Visits, Visitors, and Dwell Times

To measure numbers of vistors and the length of their visits, BueZoo retains pseudonymized MAC addresses, on average, less than five minutes. When BlueZoo sensors stop receiving probes from mobile phones, BlueZoo infers that a visitor has departed or a visit has "ended". Knowing when visits begin and end permits the calculation of dwell times.

BlueZoo Unique Visitors, and Vistor Recurrence Rates

BlueZoo fully anonymizes MAC addresses of mobile phones to retain them longer than an average of five minutes. Full anonymization is achieved by storing pseudonymized MAC (PA-MAC) addresses in a lossy storage mechanism that makes it impossible to know with certainty if a PA-MAC address has been seen before. When a mobile phone is dectected at a sensor, the PA-MAC address is stored in a Bloom Filter. One special characteristic of a Bloom Filter is that the stored value can never be converted back into a PA-MAC.

Annex 2 to certificate no. 439/23

Excluded processing activities

All B2B processes in connection with the product certified and the possibly personal data collected therein were not subject of the evaluation.

Annex 3 to certificate no. 439/23

Validity condition

The seal is awarded on the further validity condition that the lawfulness of the transfer of personal data to a non-EEA country is ensured either by a) an adequacy decision or b) equivalent technical and organisational measures by the applicant that have been approved by the Certification Body.