



CERTIFICATE

no. 326/21

ePrivacyseal GmbH
Große Bleichen 21, 20354 Hamburg, Germany

hereby certifies* that

as determined in the certification decision of 25 January 2021

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, Engage & Party Squasher“

version 12/01/2021

as defined in annex 1 and to the exclusion of the processing activities in annex 2 to this certificate.

final audit day: 20/01/2021

next planned monitoring by 31/05/2023

period of validity: 22/01/2021 – 31/05/2023

The certification decision takes place under the validity condition described in Annex 3
and in conformity with the criteria catalogue of ePrivacyseal GmbH, version 2.1. of May 2018.

Annex 1 to certificate no. 326/21

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. Consumers register MAC address on the BlueZoo.io website if the consumer do not want to participate in the collection of BlueZoo analytics.

BlueZoo Opt-in Infrastructure

One BlueZoo product, "BlueFox Engage", requires a consumer opt-in. This opt-in is performed on BlueFox sensors using an authorization page that is rendered when a consumer first connects to the BlueFox sensor's access point.

BlueZoo Visits, Visitors, and Dwell Times

To measure numbers of visitors and the length of their visits, BlueFox 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 Visitor 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.

Annex 2 to certificate no. 326/21

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. 326/21

Validity condition

The seal is awarded on the validity condition that the clients for BlueFox Engage are responsible to obtain a valid consent from the user and that valid consent is actually obtained for all data processing carried out by BlueZoo.