

Quality Information

Ref. IQ18-01

Gréasque, 20 April 2018

Subject: Architect® Biometric readers GDPR certified

Dear clients, Dear partners,

Our biometric readers comply with the requirements of French Data Protection Act no. 78-17 dated 6 January 1978 (hereinafter "1978 Act") because the fingerprint is contained in the identifying medium.

Our biometric readers comply with the requirements of new authorization AU-052 regarding biometric devices used for access control and computerized devices and applications used in workplaces.

Our biometric readers ensure that individuals remain in control of their personal template.

This compliance with the requirements imposed by CNIL (the French data protection authority) is stated in all relevant product flyers.

Until now and up to 25 May 2018, the end user has been responsible for making a prior declaration to CNIL, in accordance with Article 25-8 of the 1978 Act, stating the purpose of installing a biometric access control system.

The new European General Data Protection Regulation (GDPR) will come into force on 25 May 2018 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>) and the processing of biometric data is covered by Article 9 of the Regulation.

Under Article 9, *biometric data for the purpose of uniquely identifying a natural person* is considered as "sensitive" data **whose processing is prohibited on principle**, except where covered by one of the exceptions listed in paragraph 2 of said Article.

Each user who is responsible for data processing must check that our readers are being used appropriately and in compliance with one of the exceptions referred to in Article 9, Paragraph 2 and ensure that the national legislation mentioned in Article 9, Paragraph 4 has not introduced any further conditions or limitations.

Similarly to the 1978 Act in France, it is up to the end user to demonstrate that there is a legitimate purpose for this use and that no alternative techniques were available. They must also demonstrate that the purpose of data processing is proportionate in light of the data protection and privacy risks. In France, the CNIL authorization system (prior declaration) will be discontinued and replaced by a system of individual responsibility (self-certification).



The Data Protection Officers (DPO) in each company must put in place all technical and organizational measures necessary to protect personal data in compliance with the GDPR.

As with the 1978 Act in France, end users must at all times be able to justify the use of biometric systems via a Data Protection Impact Assessment to measure the impact of this identification method on users' security and privacy.

CNIL has published a guide for users of such solutions at <https://www.cnil.fr/fr/le-controle-dacces-biometrique-sur-les-lieux-de-travail> (in French).

For any further information, please contact your STid sales representative or write to use at info@stid.com.