

## Privacy Notice

Surveillance Technology Oversight Project, Inc. (“STOP”) is committed to ensuring the privacy of all our users. This privacy notice (the “Privacy Notice”) represents our commitment as an organization to your right to privacy, giving you a clear explanation about how we use your information and your rights over that information.

While STOP’s general Privacy Policy covers online systems offered to the public by STOP, including our website [www.stopspying.org](http://www.stopspying.org) and other websites and applications we operate, the Privacy Notice below pertains specifically to LowKey, a tool that uses machine learning research from the field of adversarial attacks to modify pixels in user-submitted image(s), seeking to make them unrecognizable by facial recognition algorithms.

References to “we”, “us” and “our” are to STOP, registered as a non-profit corporation in Delaware.

### 1. What data is covered by this Privacy Notice?

This Privacy Notice covers all data processed by LowKey, including the types of information set forth below.

### 2. What data do we collect from and about you and how do we use it?

LowKey receives the following information that may be provided by you: 1) the image(s) that you submit, and 2) any potential metadata associated with that image as it is submitted (*e.g.*, names, location where it was taken, the image size, mobile operating system information, etc.) (collectively, “Your Personal Data”).

We will use Your Personal Data for the sole purpose of generating a modified image for you that should be less likely to be recognized by facial recognition algorithms.

LowKey will process Your Personal Data solely to generate a modified image and send such image back to you. As soon as the modified image is sent to you, we will not further process Your Personal Data and none of Your Personal Data will be stored or otherwise retained.

We do not create or publish any analytics related to Your Personal Data, nor do we share Your Personal Data with any third parties, including affiliates or service providers.

We do not use cookies in connection with LowKey.

Although we will advertise LowKey on our website and on third-party sites, we will not collect or share any data about users’ visits to or interactions with our advertisements on these sites, including technical information such as the user’s IP address, browser type, or service provider.

### 3. How can you contact us?

If you wish to contact us you may contact us in the following ways:

**By mail:** 40 Rector Street, 9th Floor, New York, NY 10006

**By email:**

#### **4. Changes to this Privacy Notice**

We reserve the right to change our Privacy Notice from time to time including where this is necessary due to changes to our data processing practices or activities. If we make changes, we will post the amended Terms to LowKey and update the “Effective Date” above. Such changes will apply to you as of such Effective Date.

#### **5. Notice to EEA Residents**

The information provided in this “Notice to EEA Residents” section applies only to individuals who reside in the European Economic Area.

STOP is the controller of your personal information covered by this Privacy Policy for the purposes of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and applicable data protection laws.

The legal basis for our processing of your personal data is our legitimate interest in providing the services you access and request in connection with the LowKey tool and your explicit consent to the processing of your image for the sole purpose of enabling us to generate a modified image for you that is less likely to be recognized by facial recognition algorithms

We note that since LowKey does not retain any data or related metadata, there is no data to which the GDPR attaches.

If you are an EEA resident, you have the following rights:

- The right to request a copy of the personal data we process about you.
- The right to have incomplete or inaccurate personal data that we process about you rectified.
- The right to request that we delete personal data that we process about you.
- The right to restrict our processing of your personal data where you believe such data to be inaccurate, that our processing is unlawful, or that we no longer need to process such data for a particular purpose.
- The right to object to the processing of your personal data on grounds relating to your particular situation where the legal justification for that processing is our legitimate interest.
- The right to withdraw your consent to the processing of your personal data at any time, free of charge where you have previously consented to our processing of your personal data.

We will only process your personal data for the momentary period your image is uploaded and for the sole of producing a modified image. We will not retain any of your personal data and therefore we hold no data against which the abovementioned rights are exercisable.

You still have the right to lodge a complaint with your local data protection authority if you believe that we have not complied with applicable data protection laws.

We have implemented appropriate security measures to safeguard your personal data during the momentary period where your personal data is under our control.

**BY EMAIL/LETTER**

[Name]  
[Address]  
[Date]

**Re: Data Subject Access Request**

Dear [Name of data subject]

Many thanks for your letter of [date] making a data subject access request for [subject of request], with respect to the LowKey tool. We regret that we cannot provide you with [requested information]. This is because we do not retain any of your personal data.

Whilst your personal data will be collected and processed for a very momentary period when your image is uploaded to the LowKey tool, we do not retain the image, any of your personal data, or any related metadata.

We can also confirm that your personal data has not been shared with any third parties, including affiliates or service providers.

Nothing in the foregoing affects your right to lodge a complaint with your local data protection authority if you believe that we have not complied with applicable data protection laws.

Your sincerely,

**Surveillance Technology Oversight Project, Inc.**