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Q: What is our approach to data visibility/data privacy?

Ans:

Data visibility and data privacy have been very deliberately considered in the design of the 529 platform.

In general, our philosophy:

To bias owner/victim privacy, giving them the control of their data, individual access to their data, the ability to amend/edit their data and choice in sharing.

To allow the owner/victim to keep their registration information as accurate, complete and up to date as necessary.

To maximize the collection of accurate and complete bike information via automation which reviews records and sends email communications to the registrant when pieces of the bike registration are missing, i.e., missing photos, missing serial number, etc.

To collect only the personal information our organization needs (email address) to fulfill a legitimate identified purpose. This contrasts with many government registries which collect, or require a bunch of personally identifiable information (PII); mailing address, phone number, full name, etc.

To minimize out-of-date or incomplete information via yearly automated reminder messages to the owner on their 'bike registration anniversary'.

To provide a detailed personal-information management/privacy policy which is clear, easy to understand and readily available.

To grant partners "co-rights" to bike data for bikes they have registered, and bikes associated with the org (via assigned 529 Shields, kiosk registrations or event registrations).

To make the system as usable as possible for police given the above considerations.

To make the system as usable to the public given the above.

Overall, we think this philosophy engenders greater compliance/engagement/number of registrations by minimizing data privacy concerns for both the police and the public.

Here is detail on primary aspects of data visibility and how we treat them followed by an example of 'Who Sees What':

- A registrant only requires a valid email address to use the system. They may choose to include their name and phone number to assist in the event of theft, but that information is not required.

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- We deliberately do not ask or require unnecessary PII in the way that bike registries will (e.g., address, gender, birthdate, DL). We do this to reduce the appetite/benefit for bad actors to compromise our system or data. This also minimizes the amount of “stale” data (e.g., old home addresses or phone numbers).
- Generally, our philosophy is that the registrant / cyclist “owns” the information regardless of how it got added (self-registered, bike shop, registration event, partner (police, university, city), etc.). Once registered, the owner can change the entry, transfer or delete the bike, add/remove photos, etc.
- A bike registered “on behalf of” (e.g., via a partner) can be edited by the organization, up until the point the owner “claims” the bike - at this point the bike owner has the sole capability to edit per above (full read/write access).
- A bike registered “on behalf of” remains visible (full read access) to the registering organization. Other bikes registered by, or for the cyclist will not necessarily be visible to the organization (e.g., a self-registered bike not associated with the organization). A self-registered bike which was registered via www.project529.com versus www.project529.com/Caltrain for example will not necessarily be visible to the organization - but will show up in the org’s regional stats on their 529 Dashboard.
- If a bike goes missing and the victim creates an “alert” associated with the registration, the victim decides how widely to share the report (which links information from the bike record). They have the option to have it visible to the 529 community, social media, etc. At the extreme of privacy, a victim can file a report with no active sharing (say to file an insurance claim).
- The victim additionally can choose whether the alert includes their contact information or can be anonymized (we create a unique URL).
- All law enforcement can search all theft reports, regardless of what options a victim chooses.
- A law enforcement agency that finds a bike report via search, who was *not* the registering organization can see the details of the report but does NOT see the contact information for the user. There is a “contact owner” button in this case.
- If the organization that finds a bike report via search *is* the registering organization, they can see the contact information for the user (e.g., email and optional Name/Phone).
- The check box “allow police to see my contact information”, if selected, allows all police agencies to see the victim’s contact information on all bike registrations (even non-stolen bikes). We are going to do more to try and motivate users to use this option as it helps, particularly in the field when a suspicious bike is encountered and they may need to contact the owner (who has not filed a report with us or the police) to see if they still own the bike and did/did not give the current possessor permission for seizure.
- Finally, “proxy registrations” are another class of registrations that behave a bit differently. These are imported records from either old registries or bike shop sales data in which the organization did not have permission to give us owner information. In these cases, the bikes are essentially registered to the organization and someone finding a bike in this category will be given contact information for the shop/organization to look up the owner information.

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Q: We need to understand the roles that Project 529 and any subcontractors will be playing to safeguard our data. So, could you please provide us with an explanation of the services that are being provided by AWS?

Ans: AWS hosts all of our services (on S3) and data (RDS). They manage the hardware and the operating systems on those servers.

Project 529 writes all the software for the 529 Garage service and smartphone applications.

<https://aws.amazon.com/compliance/programs/>

<https://aws.amazon.com/compliance/data-center/controls/>

Q: Who Sees What?

Ans:

Jane Smith owns two bikes - "Trike" and "Ripper"

Jane rides by a Gotham Police Agency (GPA) registration event and they register "Ripper" for her

(At this point, GPA has full edit rights to the bike, the bike shows up in stats and reports)

Jane receives an email urging her to create a 529 account and "claims" the bike

(At this point, GPA loses edit rights, but still can see the full bike registration, photos - and it is reflected in their statistics)

Jane adds a few additional photos and details on "Ripper"

Jane self-registers "Trike" using the 529 app (and does not use a Shield associated with GPA)

(GPA can see "Ripper" via search, but does not see it in their reports, statistics and does not see owner information)

"Ripper" gets stolen and Jane files a 529 report

Jane gets an email urging her to also file a report with GPA

(GPA's reports and statistics will reflect the theft, internal alerts and hotshot will reflect the bike)

"Trike" gets stolen and Jane files a 529 report

(GPA's reports will not reflect the "Trike" theft because she self-registered without using an associated Shield)

GPA finds 4 bikes in a bust and runs them by serial numbers

- "Ripper" will show all the contact information as it was registered by GTA

- "Trike" will show a "Contact Owner" button (because Jane didn't click the 'share info to all police' button, and it wasn't a GTA registered/associated bike)

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- "Harvey", a proxy bike, tells the police to contact "Gotham Bike Shop at 555-1212 or info@gbs.bike.ca and reference invoice #12345"

- "Sally" shows the owner name, phone and email address as the user did click the 'share all info' button (even though the owner didn't report it missing to us or to the police yet). It also shows that it was associated to the University of Gotham and provides contact information for that organization.

Upon contacting the bike shop, the staff chooses to take the officer name and number and reaches out to the owner and connect the two

Sally's owner is over the moon because they didn't even know the bike was missing (they were on holiday at the time) and GPA contacts the UoG Campus Security who picks up the bike on behalf of Sally's owner