



**IDEMIA**  
(Oberthur Technologies)

# SPEECHXRAYS PROJECT

NEWSLETTER

YEAR II

SPEECHXRays



NB.3

MULTI-CHANNEL BIOMETRICS  
COMBINING ACOUSTIC  
AND MACHINE  
VISION ANALYSIS OF SPEECH,  
LIP MOVEMENT AND FACE

NOVEMBER 2017

## General Data Protection Framework



The deployment of the three use cases of the SpeechXRays project, namely the workforce use case that will be carried out within IFIN-HH, the e-health use case that will be coordinated by FORTH, and the commercial use case managed by FORTHNET, raise challenges that go from the purely administrative aspects typical for a such a large-scale testing to legal ones. On the legal side, the main endeavor of all three use cases was the full compliance with the data protection regulations which pertain to the testing process. To this end, each use case has appointed internally a legal expert for the institutional communication with the corresponding national Data Protection Authority and has submitted a Notification on personal data processing.

The submitted Notifications, one with the Romanian Data Protection Authority and two with the Greek Data Protection Authority, are mandatory according to the Romanian and Greek law and set the framework in which the three coordinating institutions, namely IFIN-HH in Romania and FORTH and FORTHNET in Greece, can process personal data.

The data processing to which the Notifications pertain covers the image and voice of the users who will test the SpeechXRays platform, as well as common elements such as name, signature, and gender of the users, without which the testing cannot be carried out. Let us note that for the purpose of the Notifications

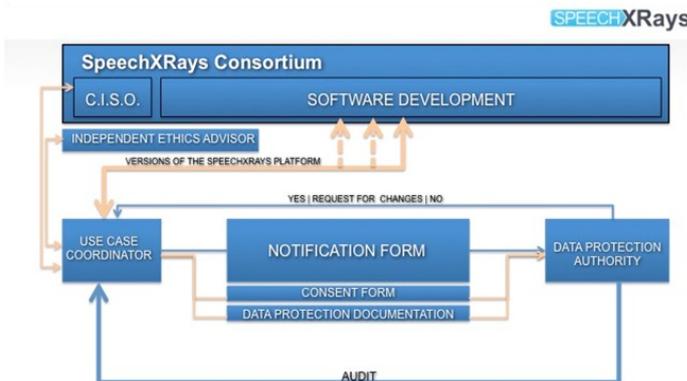
the image and voice recordings are understood as both regular and biometric data. By submitting the Notifications, the institutions which coordinate the use cases are subject to prior checks carried out by the national Data Protection Authorities and following the acceptance of the Notification they enter the register of Operators of personal data and carry the responsibility for the compliance with the applicable national and European legislation. While the Notifications and the accompanying documents are elaborated in close cooperation with all members of the SpeechXRays consortium, once the tests begin the legal responsibility for the lawfulness of the personal data processing belongs to IFIN-HH, FORTH, and FORTHNET as notified operators of personal data. In the figure below we show in a schematic way the current notification thread.

In their current form the submitted Notifications reflect the biometric solution discussed in the early phases of the project and indicate that all data processing will be done by the three institutions which coordinate the use cases, with no data processing being delegated, in any form, to other persons from within the SpeechXRays consortium or outside it. Depending on the technical specifications of the final biometric solution, now close to completion, the use case coordinators will modify the submitted Notifications and the accompanying technical documents to accommodate the requirements of the final biometric solution.

As the use cases are scheduled to finish by April 2018, the data processing done within the SpeechXRays project does not fall under the applicability of the General Data Protection Regulation (GDPR), whose implementation date is May 25, 2018, though the design of the SpeechXRays platform is such that it complies with the new requirements of the GDPR, e.g., privacy-by-design and privacy-by-default. We note that the compliance of the system with the GDPR is a key element in the future commercial exploitation of the platform, therefore our efforts on this aspect.

For the testing activities scheduled to take place in WP 6 the legal framework is set by the Data Protection Directive (officially, Directive 95/46/EC) and all subsequent amendments and national legislation derived from it (in particular, Law Nr. 677/2001 and Law Nr. 506/2004 for Romania, and Law Nr. 2472/1997 and Law Nr. 3471/2006 for Greece), but our analyses will also check the compliance with the GDPR.

**Alexandru I. Nicolin**, IFIN-HH  
**Emmanouil G. Spanakis**, FORTH  
**Ioannis Markopoulos**, FORTHNET



Generic notification thread applied by the use case coordinators in their interaction with the national Data Protection Authorities

### SUMMARY :

General Data Protection Framework .....	1
Next Event.....	2
Minimal Security Requirements for Personal Data Processing Imposed by the RDPA.....	2

## Next Event

## ICPRAM 2018

7<sup>th</sup> International Conference on Pattern Recognition Applications and Methods

Funchal, Madeira - Portugal

16 - 18 January 2018

Some members of SpeechXRays consortium will participate to the 7<sup>th</sup> International Conference on Pattern Recognition Applications and Methods (ICPRAM 2018), and also to the Satellite event « European Project Space ». This is a good opportunity for SpeechXRays teams to present the project results as well as future plans regarding continuation opportunities for building future collaborations.

Funchal, Madeira - Portugal  
16-18th January 2018



<http://www.icpram.org/EuropeanProjectSpace.aspx>

## CONSORTIUM

**IDEMIA (Oberthur Technologies)**  
(France)

**Horowitz Biometrics**  
(United Kindom)

**SIVECO (Romania)**

**Tech Inspire - TEC (United Kindom)**

**Realeyes (Estonia)**

**FORTHNET (Greece)**

**IFIN-HH (Romania)**

**Foundation for Research and Technology - FORTH (Greece)**

**University College London - UCL (United Kindom)**

**Télécom SudParis - TSP (France)**

Dissemination :

Joséphine Kohlenberg - TSP

**CONTACT : Jean-Loup Dépinay**

IDEMIA (Oberthur Technologies)  
420 Rue d'Estienne D'Orves  
92700 Colombes, France

Phone: +33 1 78 14 73 99

E-mail: [jl.depinay@oberthur.com](mailto:jl.depinay@oberthur.com)

## Minimal Security Requirements for Personal Data Processing Imposed by the RDPA

Among the elements of national legislation which have direct and practical implications on the testing of the SpeechXRays platform within IFIN-HH, we focus here on the Order 52/2002 issued by the Romanian Data Protection Authority (officially, in Romanian, "Autoritatea Nationala de Supraveghere a Prelucrării Datelor cu Caracter Personal", abbreviated here as **RDPA**) which details the minimal security requirements that any processing of personal data should comply with. The discussion below on the minimal security requirements, assumes that there is no data access outside of IFIN-HH, as indicated in the Notification submitted to the RDPA.

**The appointment of users of personal data.** Individual decisions signed by the General Director of IFIN-HH are needed for the employees who come in contact with personal data, other than the actual users of the platform. In accordance with Directive 95/46/EC, the Romanian legislation requires that the access to personal data is limited to a small number of employees of IFIN-HH.

**Types of access.** The operator, namely IFIN-HH, will identify the types of access to personal data and will decide internally the level of access for appointed employees (other than the actual users of the platform). An internal procedure which sets very clearly the confidentiality and security conditionalities that apply to the notified data processing will become operational after the Notification is accepted.

**Data collecting.** Collection of personal data will be done in accordance with the aforementioned internal procedure of IFIN-HH that mirrors the technical specifications of the SpeechXRays platform and reflects our compliance with the legal requirements on the processing of personal data.

**Safety copies.** The internal procedures of IFIN-HH relevant to the SpeechXRays project will stipulate clearly how personal data is acquired, processed, stored, deleted, and how back-ups of personal data are managed during the tests.

**Location of computers and access terminals.** The requirement of the RDPA is that all computers and/or terminals which give access or contain personal data to be re-

stricted, such that unauthorized access is stopped both at a physical level and at the level of the network access.

**Access files.** All operations concerning personal data are part of a detailed log that can be used to determine who did what on the SpeechXRays platform. This requirement is of a technical nature and is imposed to all systems which process personal data, to monitor authorized access and detect an eventually unauthorized one. SIVECO, the integrator of the SpeechXRays platform, will insure the compliance with this technical requirement and, in accordance to the law, IFIN-HH must keep this log for two years.

**Telecommunication system.** The RDPA requires that nobody should be able to intercept personal data, a requirement that can be addressed at a technical level by encrypting the personal data packages that are transmitted. The encryption of transmitted data has been agreed upon by the members of the SpeechXRays consortium and SIVECO will insure the compliance with this requirement.

**Personnel training.** The RDPA requires that all employees of IFIN-HH who use the platform, independent of their role in the testing process, are instructed in using the platform both at a general and at a technical level. To comply with this requirement, IFIN-HH, the operator, jointly with SIVECO, the integrator of the SpeechXRays platform and therefore the provider of the software, will organize training sessions and elaborate the accompanying materials for the appointed employees of IFIN-HH who come in contact with personal data, other than the actual users of the platform. Part of the employees instructed by IFIN-HH in collaboration with SIVECO will act as instructors for the actual users of the platform and will supervise the testing process.

**Computer security.** This requirement of the RDPA is a standard one and requires that anti-viruses are used on a regular basis on the computers used to process and store personal data and that no use of programs for unknown/uncertain sources is allowed.

**Printing of personal data.** The RDPA requires the operators to have clear regulation on printing and deleting personal data. In our case, no personal data will be printed.

The aforementioned technical requirements on security are minimal and the RDPA reserves the right to impose supplementary security measures when needed by the sensitive nature of the processed data.



Meeting of the IFIN-HH and SIVECO teams on the Order 52/2002 of the RDPA which sets the minimal security requirements for any personal data processing

**Mihaela Aurelia Capraroiu**  
**Alexandru I. Nicolin**

(on behalf of the IFIN-HH workforce use case)