



EMERGING TECHNOLOGY—

“The General Data Protection Regulation” Compliance?

By Douglas Florence, Sr.

Over the past decade the IoT (Internet of Things) has resulted in a digital Geostorm of sorts and parallel to this, the issue of privacy or lack thereof has also kept pace requiring companies to invest heavily in compliance programs. In the realm of video that comes in many forms to include casino surveillance that now utilizes Ai (Artificial intelligence) or machine learning to enhance decision making and business intelligence. Working with many software and hardware-based solutions over my career has provided a snapshot of what is being developed as well as the continued evolution of IP based cameras or sensors.

With the issue of privacy for personal data raising the legal bar and the need for compliance there are now some white papers that can be referenced to research what to expect from use of technology solutions to meet any

level of compliance to the General Data Protection Regulation (GDPR). *GDPR “... entered into effect on May 25, 2018, goes considerably beyond existing law in setting forth individual rights that allow data subjects to con-*

*trol how their personal data is used and how can those companies who process data ensure that they uniquely identify data subjects when administering their data subject rights.”**

At the core with regard to how do you locate or not “...the personal data or a data subject of a person who has made a request related to individual rights under the GDPR, using a technical tool for the electronic extraction of data is a first step in following the mandates of the Regulation.” Now there is an added impact from states like California adopting variations such as the California Consumer Privacy Act of 2018**.

With today's data sets being in digital formats whether in the cloud or on-site servers with reliance on proprietary software lacking inter-operability, how do we comply with these new laws? There are technology solutions, software, capable of associating the person to the data and data to the person. The data set was created by gaming operators CRM and CSM (rewards or loyalty programs,); however what about the difficulties in dealing with disparate systems?

Enter Jeff Jonas, recognized as an IBM Fellow in 2012 with alum of under 300 people since 1963. Jeff's contribution to Homeland Security began with the Senate Hearings held in July 2002 where it was revealed that his "NORA" (none obvious relationship awareness) software was being adopted by the FBI and other US government agencies.



This makes Jeff a real-world software data subject matter expert with a proven track record. In the EU when it comes to compliance to the GDPR, his new software offering from *Senzing* <https://senzing.com/gdpr/> an API has an amazing dashboard with ease of use and provides the ability to use the spider web of data sets to locate the person and his data or not. This would reduce the amount of time it will require to investigate a claim or request to remove data on someone. In addition, a high number of people do not subscribe to a loyalty program or who use cash, so how can a property locate or remove or protect that data under the GDPR today or in California, the first state in the USA adopting a

variation of the GDPR format as the CCPA 2018** that goes into effect by January 2020?

Another data set that can also be tracked is from a person's mobile devices, the smart phone, watch or anything that can connect to the IoT. Where does anyone go without a smart phone? So, to know the duration of a person being on the premise can be tracked from the origin of entry to departing, their journey or experience on the property. This mobile device data that can be tracked with a very high proficiency when designed or implemented properly. The greatest adaptation of mobile devices is in APAC (Asia Pacific Asia Central) where over 90% of all Internet use is with a mobile device. In the USA 77% of all mobile phone users have a smart device, in Canada it is 90%, in Australia 86%, and even Ghana Africa is close to 95% of smart device use. Each mobile device has a MAC ID that can be tracked and associated to transactions, visitation, individuals and is a unique identifier or data set not relying on lighting, cameras or Ai; however, it can be combined to other software and hardware solutions to enhance the accuracy.

Imagine the power of live tracking, 3G, 4G, 5G and/or using existing WiFi augmented with VRU's (visitor recognition unit) positioned at entrances, valet, cashiers, restrooms and any critical area where video surveillance is prohibited. All of this allows companies to track a single individual's experience, to locate employee resources, protect critical resources live or over time using low computing and storage capacity. *Locality Systems*, a Vancouver based technology provider www.localitysystems.com, offers this capability today for campus residential and retail environments. Imagine if this technology had been deployed in Las Vegas, tracking alerting to unusual behavior such as too many trips to a parked vehicle, loitering in hallways or an identified activity designed to thwart a terrorist or criminal act.

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The legal aspects of compliance to the GDPR or the CCPA 2018 will certainly be a topic that the IMGL will embrace and the use of technology with Ai (artificial intelligence) capability combined to software API solutions are

or layered to emerging technology solutions- be more reliable.

In conclusion, companies must invest in the right solutions, be it for compliance or security. Too often at the time of a crisis there is a rush to action fol-

needed. Even the subject of Facial Recognition, that is reliant on camera placement, lighting conditions, overcoming disguises and a myriad of other challenges, can - when combined

lowed by some level of complacency. There were major gaming properties in Las Vegas using VCR's to record video up to the time of the tragedy of October 2017: they weren't required to adopt better resolution up to that point. This tragedy spawned an immediate response given the significance of the event. Today we are reliant on technology in our everyday life. Adversity to tracking combined with the need for privacy will be considerable but the real need for security and safety perhaps trumps the adversity to what technology can contribute to our daily life and the consideration of how any business can be compliant to emerging privacy laws. ♣

* The Importance of Accurate Retrieval of Data Subjects' Personal Data in Complying with GDPR Individual Rights Requirements
By - Jan Dhont, Peter Swire & DeBrae Kennedy-Mayo

**Assembly Bill No. 375 CHAPTER 55. An act to add Title 1.81.5 (commencing with Section 1798.100) to Part 4 of Division 3 of the Civil Code, relating to privacy. [Approved by Governor June 28, 2018. Filed with Secretary of State June 28, 2018.]

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