

CERTIFICATE OF GDPR COMPLIANCE

Pupil Labs GmbH

This is to certify that Pupil Labs GmbH has successfully completed an external GDPR compliance audit conducted by ProCheckUp Ltd.

This certificate is valid from 17th June 2024 – 16th June 2025.

Audit Date: 12th June 2024 – 17th June 2024

Scope of the Audit :

The audit assessed the GDPR compliance of Pupil Labs GmbH wearable devices and associated software (Pupil Invisible and Neon), focusing on data protection measures and user data processing practices.

Summary of Findings :

No potential GDPR breaches were identified.

Pupil Labs GmbH acts as a data processor, with no control over the data usage by end clients.

Recommendations were provided to enhance the overall security posture and ensure ongoing GDPR compliance.

Usage Disclaimer :

Pupil Labs GmbH has no control over how the device and software are used once purchased by the end client (whether an individual or an institution). While Pupil Labs provides guidance on potential GDPR issues related to the device and software usage, enforcing compliant usage is not feasible. Typically, a research institute buys a number of eye-tracking devices for their research group. Users wear the device to perform specific tasks, during which the sensors record eye videos, scene video, audio (if enabled), and IMU data. This data is used to generate gaze and eye state data, providing insights into what is salient for the wearer in their environment at any given moment. This information is then overlaid on the video to facilitate further research and understand the interaction of the wearer with the environment.

ProCheckUp Contact Information :

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