

Wi-Fi data collection

This page explains how and why Merthyr Tydfil County Borough Council collects Wi-Fi connection data from mobile devices at Merthyr Tydfil.

Wi-Fi data is used to provide us with detailed visitor footfall information helping us to primarily understand how busy the high street. **It is not used to identify specific individuals or monitor browsing activity.**

Signs have been put up at every location we have a footfall sensor explaining the Wi-Fi data collection that is taking place and how to opt-out.

In summary, we are collecting data on how many mobile devices are counted by each footfall sensor, identifying them by a pseudonymised version of their MAC address.

We are trying to understand patterns of movement throughout the high street and how many visitors are seen on a daily basis.

We are not collecting data on browsing activity, cookies, phone numbers or whether any Wi-Fi services are used.

However, if you would like to opt-out, you can do this by turning off Wi-Fi on your device, turning your device off or putting your device into airplane mode.

What Wi-Fi connection data is

When a device such as a smartphone or tablet has Wi-Fi enabled, the device will continually search for a Wi-Fi network to connect to. When searching for a Wi-Fi network, the device sends out a probing request which contains an identifying number specific to that device known as a Media Access Control (MAC) address. This is what we mean by 'Wi-Fi connection data'.

How we collect it

When searching for WiFi networks to connect to the mobile device sends out a probe request. Our footfall sensors capture's the probe request, logs the MAC address, time and date the capture occurred and by which sensor. This data is then encrypted and sent to our footfall monitoring system.

This data collection is carried out independently by Merthyr Tydfil County Borough Council. Proximity Futures, the provider of the system retains access to the system for ongoing support and maintenance purposes.

How we make sure we can't identify people

We will not be able to identify any individuals from the data collected. We have designed the process to identify patterns and to avoid identifying individuals. We are trying to understand how visitors as a whole use the high street.

All data collected is automatically depersonalised, using a one-way pseudonymisation process to ensure Merthyr Tydfil County Borough Council is unable to identify any individual. This happens immediately after the data is first collected.

Pseudonymisation is the process of distinguishing individuals in a dataset by using a unique identifier that does not reveal their 'real world' identity. This is a way of protecting people's privacy in accordance with the [Information Commissioner's Anonymisation Code of Practice](#).

Legal basis for using this information

Under privacy and data protection legislation, Merthyr Tydfil County Borough Council is only allowed to use personal information if we have a proper reason or 'legal basis' to do so. In the case of Wi-Fi connection data, our 'legal ground' for processing this data is:

- Our statutory and public functions
 - to undertake activities to promote and encourage safe, integrated, efficient and economic facilities and services.

Length of time we keep Wi-Fi connection data

Merthyr Tydfil County Borough Council will retain any data collected in line with our data retention policies. This means that we will not hold information for longer than is necessary for the purposes we obtained it for. Depersonalised Wi-Fi connection data will be held for two years after the last time the device was recorded.

Keeping information secure

We take the privacy of our visitors very seriously. A range of policies, processes and technical measures are in place to control and safeguard access to, and use of, Wi-Fi connection data.

Each MAC address is automatically depersonalised (pseudonymised) and encrypted to prevent the identification of the original MAC address and associated device. At no time does Merthyr Tydfil County Borough Council have access a device's original MAC address.

All access is governed through industry standard authentication methods. Access is limited to a restricted group of users - i.e. only those whose access to the data is necessary for their role.

Our encryption keys are held securely in an industry standard computer program for secrets and key management , and we use an industry standard one-way hashing algorithm. All data is encrypted at rest and when in transit.

Sharing information

Individual depersonalised device Wi-Fi connection data is accessible only to a controlled group of Merthyr Tydfil County Borough Council employees and Proximity Futures. Aggregated data developed by combining depersonalised data from many devices may be shared with other Merthyr Tydfil County Borough Council departments and external bodies. Aggregated data will include counts of numbers of devices, rather than data containing pseudonymised MAC addresses.

We understand that there may be scenarios where the data could be useful to the police and other organisations that uses summarised footfall data. These types of requests will be dealt with on a strictly case-by-case basis to ensure that any disclosure is lawful.

We would only be able to disclose pseudonymised data, as we do not hold the original MAC address.

Your information rights

Please also refer to the guidance above on how to choose not to provide your device's Wi-Fi connection data.

In order to realise some of the benefits of collecting this data, it is important that visit patterns are understood over time. This means that we have to preserve our hashing key to maintain continuity of the pseudonymised data. It would therefore technically be possible to align the same MAC address to the same pseudonym. However, the only way XXX can determine a specific pseudonym is for the MAC address to be provided to us, as we do not retain the MAC address itself.

The rights under Articles 15 to 20 of the General Data Protection Regulation (GDPR) do not apply if XXX is not in a position to identify a specific individual, unless the individual provides additional information to enable identification. Only providing a MAC address does not establish a definite link between that individual and the pseudonymised visit information.

Even if we could associate a particular visit with a pseudonymised MAC address, we cannot assume the same individual was in possession of the same device during every visit. It would not be practical or proportionate to establish who was carrying the phone at each point in time.

This means that we are unable to provide data in response to any requests to access the Wi-Fi data generated by your device.

The Merthyr Tydfil County Borough Council Privacy and Data Protection team consider and coordinate responses to any requests that relate to an individual's rights under the GDPR and complaints from people whose personal data is processed by Merthyr Tydfil County Borough Council. You can contact the Data Protection Officer by email at Data.Protection@merthyr.gov.uk