

Informative Note on Project Hafnia

This note has been prepared by Milestone Systems A/S (“Milestone”) to assist the Municipality of Genoa (“Genoa”) in its assessment of general civic access requests relating to Project Hafnia.

The purpose of this note is to provide factual context regarding Milestone’s role in the collaboration. It is not intended to constitute a full technical specification or a legal opinion, and it does not amend or override any agreement between the parties.

1. Overview

Project Hafnia is an AI development initiative by Milestone. It explores the development and improvement of computer vision models and related AI capabilities for real-world visual environments.

Genoa’s involvement is a specific collaboration within Project Hafnia. The collaboration is governed by a contractual framework agreed between Genoa and Milestone. In this note, Genoa’s involvement is referred to as the “collaboration”.

The collaboration concerns the use of a limited and purpose-specific subset of selected historical recordings from Genoa’s traffic and public-space environments for AI development, evaluation, and improvement within the agreed contractual framework.

The collaboration uses data from real-world operating conditions to support the development and evaluation of AI capabilities, with safeguards intended to reduce privacy and security risks and the risk of misuse.

The collaboration is one specific part of Project Hafnia and does not represent the full scope of the initiative.

2. Purpose of the collaboration

The purpose of the collaboration is to support the development and evaluation of computer vision models using data that reflects traffic and public-space environments.

Computer vision model performance can be affected by contextual factors such as road layouts, lighting conditions, weather, traffic density, camera angles, and other environmental conditions. The collaboration provides data reflecting such real-world conditions within the agreed scope.

A key objective is to use data that is relevant to real-world operating environments and to handle that data under defined contractual, governance, security, and data-protection safeguards.

The collaboration provides a basis for evaluating AI capabilities against local contextual patterns present in the selected recordings.

The collaboration is not intended to identify individuals, track individuals, perform profiling, or enable biometric identification. The identity of individuals appearing in recordings is not relevant to the collaboration's objectives, and recordings are processed with anonymization techniques before use in AI development.

3. Data scope

The collaboration does not involve unrestricted access to Genoa's entire camera network and does not involve access to live surveillance feeds. Instead, the collaboration concerns selected historical recordings from traffic and public-space environments.

The selection of recordings supports the collaboration objectives and reflects relevant operational conditions, such as different traffic patterns, times of day, weather conditions, and road environments.

For the collaboration, Milestone received video recordings from 357 selected cameras. Following review and filtering for relevance to the collaboration objectives, recordings from 80 selected cameras were anonymized and used for the collaboration. For the recordings retained for anonymization, the retained footage amounted to approximately 6,000 hours in total, equivalent to an average of 75 hours per camera. The original, non-anonymized recordings were deleted from Milestone's processing environment, including the original versions of the recordings that were anonymized.

These figures are included to illustrate that the collaboration is based on a limited and purpose-specific subset of historical recordings, rather than broad or continuous access to Genoa's video infrastructure.

4. Anonymization and data handling

Before recordings are used for AI development, they are processed with anonymization techniques using technology from Brighter AI, a company within the Milestone group.

The anonymization process is designed to reduce identifiability by replacing identifiers such as facial characteristics and vehicle license plates with synthetic alternatives.

The data handling and anonymization process includes the following stages:

1. selected historical recordings are extracted locally at Genoa's facilities;
2. the selected recordings are transferred to a Milestone-controlled environment;
3. the recordings are processed with anonymization techniques;

4. original recordings are deleted from Milestone's processing environment;
5. anonymized recordings are annotated for relevant objects and events; and
6. the anonymized and annotated data is used for AI development.

5. Governance and contractual framework

The collaboration is governed by contractual arrangements between Genoa and Milestone, including data-protection documentation.

Within the collaboration and as reflected in the contract, Genoa is identified as the data controller for the processing of personal data described in the data processing agreement. Milestone processes personal data in accordance with the agreed contractual terms and data processing agreement.

6. Safeguards

The collaboration includes contractual, organizational, and technical safeguards intended to reduce privacy and security risks.

These safeguards include:

1. use of a limited and purpose-specific dataset;
2. no access to live camera streams;
3. use of anonymization techniques before annotation and AI development;
4. restriction of personal data processing to the agreed collaboration purposes;
5. access limited to authorized personnel with a need to know;
6. processing within controlled Milestone environments;
7. deletion of original recordings from Milestone's processing environment after anonymization;
and
8. internal logging and governance controls.

7. Storage and processing location

Personal data handled by Milestone for the collaboration is processed and stored within environments located in the European Economic Area.

Project Hafnia is designed to be data-center agnostic, meaning that it is not tied to a single infrastructure provider or deployment environment. This design can support deployment flexibility, resilience, and data-location requirements.

8. Collaboration outputs

The collaboration includes testing and evaluation of computer vision capabilities in a local operational context.

The selected recordings reflect local traffic patterns, road layouts, weather conditions, camera perspectives, and other operational conditions relevant to the collaboration.

9. Confidentiality and redactions

Milestone supports appropriate transparency regarding the public-administration context of the collaboration. At the same time, certain information should be withheld or redacted where disclosure would reveal non-public commercial terms, technical-commercial know-how, security-sensitive information, privacy-sensitive information, trade secrets, intellectual property, or other confidential information.