

August 21, 2009

Mr. Jacob Glick
Canada Policy Counsel
Google Inc.
340 Albert Street, Suite 1300
Ottawa ON
K1R 7Y6

Dear Mr. Glick:

Re: Google StreetView

We are writing in light of the presentation and consultation provided by you to the Office of the Privacy Commissioner of Canada (OPCC) on August 5, 2009, in which you outlined Google's proposed retention plan for images collected for its StreetView application. We appreciated having the opportunity to hear your proposal and are of the view that we now have a clear understanding of your plans for the retention of images.

As we understand it, Google is proposing to retain images for a maximum period of one year after publication, after which time, the images will be permanently blurred. You stated that this process of permanently blurring images is non-reversible. In previous discussions, Google had not provided a clear timeline around the issue of retention and we are pleased that Google has taken steps to meet this important requirement under Canada's private-sector privacy legislation.

Your presentation provided a clearer picture of the rationale for retaining unblurred images. We understand that the blurring technology needs to be perfected as false positives (where images that are not faces or licence plates are blurred) may obscure certain data needed for Google's mapping services.

On the whole, the retention period presented to us appears reasonable, given the business purposes, provided Google is meeting its obligations under Canada's private-sector privacy legislation. As you know, our concerns in this regard have been outlined in previous correspondence and meetings, and in the document, *Captured on Camera – Street-level imaging technology, the Internet and you*.

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In addition to the retention schedule that you are proposing, you currently use blurring technology, which you continue to improve, and you have mechanisms to allow the images to be blocked or taken down.

We have also stated that the unblurred images must be protected with appropriate security measures. In Google's appearance before the House of Commons Standing Committee on Access to Information, Privacy and Ethics (ETHI), you indicated that the images are securely protected.

We would again highlight the need for knowledge and consent – you must let citizens know that they are going to be photographed, when, why, and how they can have their image removed. We would also encourage you to be sensitive about the areas you choose. We note that in your company's appearance before the ETHI Committee, you committed to contacting community organizations prior to the launch of StreetView in Canada to notify them of the blurring capability as well as the process for having images removed, in case they wish to explore that option. We appreciate your undertaking to do so.

During your recent presentation to the OPCC, you mentioned that it may be possible to reduce the retention period at some point. This is encouraging news. We would like to have an undertaking from you that we would be able to meet with you at the end of the one-year period to review progress on the permanent blurring process and on any additional improvements that could be made.

We would like to take this opportunity to thank you for your ongoing cooperation with our Offices and for your efforts to bring Google StreetView into compliance with Canada's private-sector privacy legislation.

Sincerely,



Jennifer Stoddart
Privacy Commissioner of Canada



Frank Work
Information and Privacy Commissioner of Alberta

A handwritten signature in black ink, appearing to be 'D. Loukidelis', written in a cursive style.

David Loukidelis
Information and Privacy Commissioner
of British Columbia

A handwritten signature in black ink, appearing to be 'Jacques Saint-Laurent', written in a cursive style.

Jacques Saint-Laurent
Président de la Commission d'accès à l'information
du Québec