



# CONTACT TRACING SOLUTION DRIVEN BY MIST AI

A Privacy Compliance Whitepaper

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# EXECUTIVE SUMMARY

Enterprise customers rely on Mist AI technology from Juniper Networks for a superb Wi-Fi experience. Now, as we continue to work through these challenging times with COVID-19, customers can look to Juniper Mist™ cloud services to support the health and safety of any individuals, such as personnel and guests, using or visiting customers' facilities.

We know that COVID-19 is easily spread, and we also know the significant impact it can have on individuals—especially those who are more sensitive or at-risk. Therefore, it is incumbent upon enterprise networks to adopt measures that create safe spaces for users and limit the spread of the pandemic.

Doing so in an effective, scalable, and non-intrusive way poses a significant challenge to many organizations. Some products require large amounts of information, while others require individuals to install an app on their devices. Both approaches increase user concern and discourage adoption.

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## Introduction

The Juniper Contact Tracing solution driven by Mist AI offers our customers the contact tracing tools they need to protect their personnel and guests while ensuring privacy as customers begin to reopen—and employees return to—workplaces.

How can the Contact Tracing solution promote and protect the health and safety of our customers' personnel and guests while—critically—addressing key privacy considerations? This paper describes how our contact tracing solution fits in with your workplace-return programs while staying focused on data privacy.

## The Solution

The Juniper Contact Tracing solution driven by Mist AI uses analytics, self-driving Wi-Fi, and patented virtual Bluetooth® technology to deploy effective hot zone alerts, user journey information, and proximity tracing through Juniper Mist Premium Analytics cloud service. Through devices that connect to the solution's signal (Wi-Fi or Bluetooth technology), the customer's administrator is able to receive hot zone alerts when the number of connected devices exceeds the customer's established baseline.

Hot zone alerts enable customers to identify congested areas and take precautionary measures such as reconfiguring meeting rooms and workspaces. Similarly, using just the identities of devices and the Premium Analytics cloud service, customers can trace the journey of a particular device so that, in the event an individual reports that they have tested positive for COVID-19, the administrator can quickly investigate and immediately notify others who have been in close proximity with the reporting person.

Importantly, hot zone alerts can also be configured to not reveal the identities of individuals, and contact tracing solution does not require any health information in order to be effective. Furthermore, customers can opt for a badge-based solution that utilizes Bluetooth signals as a source of location for congestion alerting as well as journey mapping and proximity tracing. And while an app is not required, Mist offers a software developer's kit that customers who prefer that approach can use to develop their own app to assist with contact tracing efforts.

## Privacy

Privacy is a top priority for Juniper. In our effort to protect the health and safety of our personnel and guests, we must also support the privacy of their personal information.

The contact tracing solution is designed to provide insightful data in accordance with our customer's configuration for their specific needs. Each customer's goals differ, and we designed the solution to deliver maximum flexibility that allows customers to control whether, and how, to associate user identities with the solution.

The key privacy principles we considered when designing the Juniper Contact Tracing solution driven by Mist AI are based on current laws such as the European Union General Data Protection Regulation and California Consumer Privacy Act. These include:

- 1. Lawfulness, Fairness, Transparency:** Processing of personal information must be lawful, and processing personal information for the purposes of protecting the health and safety of personnel is a legitimate interest.

Companies and other organizations need to be responsible corporate citizens and community members. This includes taking appropriate and necessary health and safety measures to control the spread of COVID-19.

Nothing is zero-risk, but organizations need effective tools to help create safer environments for personnel and guests. The Juniper solution provides customers with such a tool.

In addition to customizing the types of personal information the solution processes, customers can customize the terms and conditions presented to individuals before they connect to the solution so that customers can include any necessary disclosures or obtain any applicable consents, ensuring the processing of personal information is lawful, fair, and transparent.

- 2. Purpose Limitation:** Juniper developed the contact tracing Solution with flexibility in mind, including built-in tools that allow customers to only collect, track, and process the personal information necessary for their contact tracing initiatives.

While personnel and guests are on campus, the Mist solution utilizes device signals to pinpoint the location of the device or ID badge (if BLE enabled). Administrators can use the location information to quickly respond to any potential incidents of COVID-19 infection in its campus, promote social distancing, identify possible infection areas, and notify personnel and guests who may have been exposed to COVID-19 while on the customer's campus. Customers can be confident that the collected personal information is not further processed in a manner that is incompatible with the initial purpose.

- 3. Data Minimization:** The Juniper Mist Wi-Fi platform only collects the minimal amount of relevant and necessary personal information to enable use of the Juniper Mist Wi-Fi service, anticipate and address network performance and connectivity issues, and provide support. Further collection and processing of personal information, such as for contact tracing purposes, is available—but only if customers choose to procure the features associated with the Juniper Contact Tracing solution.

- 4. Accuracy:** The Juniper Contact Tracing solution promotes data accuracy by only collecting electronic information that is automatically produced by devices, reducing the types of errors commonly associated with human-entered data. Data is protected in secured environments designed to prevent it from being modified and rendered inaccurate through unauthorized or unlawful access. Please see the "Integrity and Confidentiality" section for additional security information.

- 5. Storage Limitation:** Personal information processed for the Juniper Contact Tracing solution is stored for 30 days, allowing customers to view historical traffic patterns and dwell times for personnel and guests who have reported testing positive for COVID-19. Data may be stored for longer periods depending on customer-specific needs such as data retention policies.

- 6. Integrity and Confidentiality:** Juniper implements security features designed to ensure appropriate security of personal information, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Personal information is stored in the Juniper Mist AWS data center. Personal information of our European Union customers is stored by default in our Amazon Web Services (AWS) data center in Germany. Personal information is collected and retained in accordance with access and security protocols designed to maintain the privacy and confidentiality of the individual's information.

Access to this personal information is limited to customer administrators, who may choose to share such data with Juniper. If administrators do elect to share data with Juniper, we will only use the data in the context of the solution. Furthermore, if customers deploy their Mist solution in conjunction with a third-party contact tracing tool, Juniper will not share the customer's Mist data with third parties unless the customer consents to the disclosure. Further, our solution can be effective with use of only the device, badge, or mobile application ID number. No individual identities are necessary. Specific individual identities are only associated with device IDs should the customer wish to connect individuals to device IDs.

Additionally, personal information is stored in the Juniper Mist cloud, which is co-located in the AWS Cloud—an environment with industry-standard certifications. Customers can rest assured knowing the Juniper data centers feature state-of-the-art physical and cyber security with highly reliable designs. Industry-standard encryption is utilized for data communications across network administrators, infrastructure hardware/software, end users, and the Mist cloud, while stored data is block-encrypted. Juniper secures personal information by implementing various controls, such as encryption and obfuscation. Please review our [“Privacy and Security: AI-Driven Trust” technical brief](#) for additional information.

- 7. Accountability:** The Juniper solution allows customers to demonstrate compliance with personal information processing principles by allowing customers to tailor the terms and conditions provided to personnel and guests prior to their connection to the network. Juniper makes data security information available to customers, educating them regarding the security practices Juniper built into the Mist solution. Juniper puts a data protection and privacy agreement in place with customers that incorporates the European Commission's standard contractual clauses and other provisions applicable to Juniper. In accordance with applicable laws, Juniper assists customers with data protection impact assessments and other data protection-related queries. Juniper also conducts its own data protection impact assessments where necessary and follows other accountability principles.

## Conclusion

Our customers need evidence-based tools to ensure that health and safety concerns are addressed as employees return to their workplace. Digital contact tracing is a crucial component of any comprehensive return-to-work program.

Juniper helps customers deploy contact tracing solutions in an effective and scalable manner—one that adopts the least intrusive methodologies possible. Most importantly, as with Juniper's other leading AI-based Wi-Fi solutions, the Juniper Contact Tracing solution was developed with data privacy at the forefront. Customers retain extensive control over the types and amounts of personal information collected by the Juniper solution.

Further, the solution is designed to operate effectively without such identifying information like names or e-mail addresses—a device ID is all Mist AI needs. Finally, Juniper is continuing to explore new technologies and processes to provide both customers and individuals with the best experience possible using privacy-conscious approaches. As the leader in AI-based Wi-Fi solutions, Juniper's Mist AI is uniquely positioned to assist customers with their contact tracing efforts while keeping data privacy a top priority.

## About Juniper Networks

Juniper Networks brings simplicity to networking with products, solutions, and services that connect the world. Through engineering innovation, we remove the constraints and complexities of networking in the cloud era to solve the toughest challenges our customers and partners face daily. At Juniper Networks, we believe that the network is a resource for sharing knowledge and human advancement that changes the world. We are committed to imagining groundbreaking ways to deliver automated, scalable, and secure networks to move at the speed of business.

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