

**To : The Privacy Commissioner for Personal Data (“PCPD”)  
Hong Kong SAR,**

### **UNDERTAKING**

This undertaking is given in relation to the recent reported incident of the collection of Wi-Fi data by Google Street View cars in Hong Kong which may contain personal data (the “Incident”).

I hereby on behalf of Google Inc. (“Google”) undertake :

- (1) That Google shall forthwith cease its operation of the Street View cars in Hong Kong until it is confirmed through an independent third party’s verification that they are not capable of collecting personal data;
- (2) To provide to PCPD as soon as practicable a copy of the entire Wi-Fi data collected in Hong Kong. Google shall provide such assistance as may be required to facilitate PCPD’s understanding of the process of the collection and the interpretation of the collected data;
- (3) In the meantime to securely store the Wi-Fi data collected in Hong Kong (including any backup, archives or copies) and not to tamper with or subject them to any unauthorized uses or access which may be a contravention of the laws of Hong Kong;
- (4) That upon the request of PCPD, to completely delete the Wi-Fi data collected in Hong Kong (save the non-personal data already extracted) and to provide the PCPD with an independent third party’s verification of such deletion;
- (5) To carry out an internal review of the Incident and all procedures in relation to Street View cars operation in Hong Kong so that sufficient controls are in place to ensure that no personal data are collected, and to provide to PCPD the full report of the review;
- (6) To provide a confirmation from an independent third party that the software and the process used to collect Wi-Fi data in Hong Kong will not collect personal data;

- (7) To implement the afore-mentioned measures as soon as practicable;
- (8) That the Street View cars shall only resume operation in Hong Kong when this Undertaking has been fully performed; and
- (9) That any future Street View car operation to be carried out in Hong Kong shall otherwise comply with the requirements of the Personal Data (Privacy) Ordinance, Cap 486, Laws of Hong Kong.

Dated                      May 2010

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Google Inc.